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RECOMMENDATION APPROVED;
RESOLUTION NO. 17-8180 ADOPTED
BY THE BOARD OF HARBOR COMMISSIONERS

OCTOBER 19, 2017

AMBER M. KLESGES
Board Secretary

THE PORT OF LOS ANGELES
Executive Director's
Report to the
Board of Harbor Commissioners

DATE: **OCTOBER 11, 2017**

FROM: **ENVIRONMENTAL MANAGEMENT**

SUBJECT: **RESOLUTION NO. 17-8180 - FINAL ENVIRONMENTAL IMPACT REPORT FOR THE BERTHS 226-236 EVERPORT CONTAINER TERMINAL IMPROVEMENTS PROJECT (APP NO. 131015-136; SCH NO. 2014101050)**

SUMMARY:

Staff requests that the Board of Harbor Commissioners (Board) certify the Final Environmental Impact Report (EIR) for the Berths 226-236 Everport Container Terminal Improvements Project prepared in accordance with the California Environmental Quality Act (CEQA), and approve Alternative 5 as identified in the EIR for the proposed Everport terminal modifications. Staff has chosen to recommend adoption of this alternative, as opposed to the proposed Project in the EIR, as it would offer greater on-dock rail potential while meeting the project objectives and supporting the goals of the Clean Air Action Plan. Like the proposed Project, Alternative 5 also requires federal permits from the United States Army Corps of Engineers (USACE). As a result, the document was prepared as a joint Environmental Impact Statement (EIS)/EIR per the requirements of CEQA and the National Environmental Policy Act (NEPA). The USACE will consider approval of the EIS in their decision to grant permits for Alternative 5 in a separate action.

Alternative 5 is similar to the proposed Project in that it would improve marine shipping and commerce at the existing Everport Container Terminal located at Berths 226-236 on Terminal Island to accommodate larger container vessels (up to 16,000 twenty-foot equivalent units (TEUs)) that are anticipated to call at the Everport Container Terminal through the proposed lease extension through December 31, 2038 under Permit 888. Accordingly, Alternative 5 would consist of deepening two existing berths (Berths 226–229 and Berths 230–232), adding five new 100-foot gauge A-frame over-water gantry (wharf) cranes, raising up to five existing operational cranes, adding five alternative maritime power (AMP) vaults, and constructing backland improvements. Unlike the proposed Project, however, Alternative 5 would also increase the capacity of the Terminal Island Container Transfer Facility (TICTF) by adding track in order to process more containers at this on-dock facility. Though the overall throughput increase for the facility would be the same under Alternative 5 as for the proposed Project due to space limitations of the container yard backland area, Alternative 5 has the potential to cause fewer containers to be moved offsite by truck than the proposed Project thereby

potentially reducing environmental impacts. As a result, identical to the proposed Project, Alternative 5 would increase the capacity of the Everport Container Terminal from 1,818,000 TEUs annually to 2,379,525 TEUs annually by 2038, which is an increase of 561,525 TEUs.

In this action, the Board will need to independently review and consider the Final EIR and, if deemed adequate under CEQA, certify the EIR, adopt specific Findings of Fact (FOF) regarding the significant environmental impacts of Alternative 5 and mitigation measures to reduce or avoid such impacts, adopt a Statement of Overriding Considerations (SOC), and adopt a Mitigation Monitoring and Reporting Program (MMRP). Similar to the proposed Project, with the application of mitigation measures and lease measures, significant and unavoidable impacts from Alternative 5 would remain related to the following impact areas: air quality, biological resources, cultural resources, and greenhouse gas emissions. Aside from mitigation and lease measures that are the responsibility of the tenant as outlined in the MMRP, the construction of Alternative 5 is the financial responsibility of the City of Los Angeles Harbor Department (Harbor Department).

RECOMMENDATION:

It is recommended that the Board of Harbor Commissioners (Board):

1. Certify the Final Environmental Impact Report for the Berths 226-236 Everport Container Terminal Improvements Project (a) has been completed in compliance with the California Environmental Quality Act (Public Resources Code §21000 et seq.), with the California Environmental Quality Act Guidelines (14 Cal. Code Regs. §15000 et. seq.), and the City of Los Angeles California Environmental Quality Act Guidelines; (b) was presented to the Board of Harbor Commissioners for review and the Board of Harbor Commissioners considered the information contained in the Final Environmental Impact Report prior to approving Alternative 5 of the Berth 226-236 Everport Container Terminal Improvements Project; and (c) reflects the independent judgment and analysis of the City of Los Angeles Harbor Department, and that all required procedures have been completed;

2. Adopt the Findings of Fact and Statement of Overriding Considerations;

3. Find that, in accordance with the information contained in the Final Environmental Impact Report, Alternative 5 of the Berths 226-236 Everport Container Terminal Improvements Project will have significant environmental effects on air quality and meteorology, biological resources, cultural resources, and greenhouse gas emissions as defined by Public Resources Code Sections 21068 and 21082.2, and the State California Environmental Quality Act Guidelines, Sections 15064, 15064.4, 15064.5, and 15382;

4. Find that, in accordance with the provisions of the California Environmental Quality Act Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Berths 226-236 Everport Terminal Improvements Project, including the selection of Alternative 5, which substantially lessens or avoids one or more of the significant adverse environmental impacts identified in the Final Environmental Impact Report;

5. Find that, in accordance with the provisions of the California Environmental Quality Act Guidelines Section 15091(a)(3), specific economic, legal, social, technological, or other considerations, make infeasible certain mitigation measures such that some environmental impacts remain significant and unavoidable;

6. Find that, all information added to the Final Environmental Impact Report after public notice of the availability of the Draft Environmental Impact Report for public review but before certification, merely clarifies, amplifies, or makes insignificant modifications in an adequate Environmental Impact Report and recirculation is not necessary;

7. Find that, in accordance with Public Resources Code Section 21081(b) and California Environmental Quality Act Guidelines Section 15093, the benefits of creating a more efficient facility at Berths 226-236 outweigh the significant and unavoidable environmental impacts, and adopt the Findings of Fact and Statement of Overriding Considerations;

8. Adopt the Mitigation Monitoring and Reporting Program as required by Public Resources Code, Section 21081.6. The Mitigation Monitoring and Reporting Program is designed to ensure compliance with the mitigation measures, lease measures, and standard conditions adopted to avoid or lessen significant effects on the environment, pursuant to and identifies the responsibilities of the City of Los Angeles Harbor Department, as lead agency, to monitor and verify project compliance with those mitigation measures and lease measures;

9. Approve Alternative 5 of the Berths 226-236 Everport Container Terminal Improvements Project identified in the Environmental Impact Report including all feasible mitigation measures and lease measures with consideration of the Findings of Fact and Statement of Overriding Considerations, and the Mitigation Monitoring and Reporting Program;

10. Direct the Cargo and Industrial Real Estate Division to incorporate by reference the Environmental Impact Report, mitigation measures, lease measures, and Mitigation Monitoring and Reporting Program into any and all lease agreements or assignments encompassed in the approved Project;

11. Authorize the Environmental Management Division to file the Notice of Determination with the Los Angeles County Clerk, the Los Angeles City Clerk, and the State Secretary of Resources; and

12. Adopt Resolution No. 178180.

DISCUSSION:

Background/Context – The fleet mix of vessels calling at the Port of Los Angeles (Port) is trending toward larger vessels as shipping lines continue to increase the size of the vessels they are building. As many terminal berths and cranes within the Port and across the country were not designed to handle vessels of the size that are projected to enter the fleet mix over time, modifications to these facilities are necessary to allow for the efficient servicing of these vessels. The fleet mix of the Everport Container Terminal is expected to include vessels of up to 16,000 TEUs through the end of the terminal's proposed lease extension of December 31, 2038. For these reasons, Everport has proposed terminal modifications that would help the facility be able to service newer and larger ships in the next few decades.

To accomplish Everport's objectives, the Notice of Intent/Notice of Preparation for an EIS/EIR proposed to analyze a Project that would optimize its container yard backland area, deepen its berths, increase the number and size of its ship to shore cranes, and optimize its operations in anticipation of a changing fleet mix expected to be calling at the terminal over the next few decades.

In accordance with CEQA and NEPA, five project alternatives were analyzed in the environmental document to consider if potential environmental impacts of the proposed Project could otherwise be reduced. These alternatives included: (i) No Project at all, (ii) No Federal Action, (iii) Reduced Wharf, (iv) No Backland Expansion, and (v) Expanded On-Dock Rail. After receiving comments on the Draft EIS/EIR, staff has decided to recommend that the Board of Harbor Commissioners approve Alternative 5 – Expanded On-Dock Rail, instead of the proposed Project, for the Everport Container Terminal. Alternative 5 not only contains the same project components originally proposed but also expands on-dock rail capacity with the addition of one rail track at the TICTF. This would allow Alternative 5 to achieve the efficiency and expansion objectives of the originally proposed Project while diverting more containers off local streets and freeways.

Multiple comments were received on the Draft EIR, including three that recommended Alternative 5 be selected as the Project. In addition, the 2017 Draft Clean Air Action Plan (CAAP) was released subsequent to the release of the Draft EIR that also contains a goal of expanding the use of on-dock rail. Alternative 5 is, therefore, consistent with the CAAP and addresses comments raised and achieves the objectives of the Project.

Project Objectives - The primary objectives of the proposed Project are:

- Optimize the use of existing facility and associated waterways in a manner that is consistent with the Harbor Department's public trust obligations;
- Provide sufficient depth to accommodate larger vessels anticipated to call at the terminal;
- Provide new cranes and raise existing cranes to efficiently service the larger container ships anticipated to call at the terminal;
- Improve the container terminal and container handling facilities to accommodate more efficient loading/unloading of the larger and increased number of ships anticipated to call at the terminal;
- Improve the container terminal backland capacity;
- Add an additional rail track to promote more container transport off-site via rail rather than truck;
- Maximize container land use and operations at the Everport Container Terminal consistent with the Port Master Plan; and
- Promote the long-term development and growth of the Port.

Project Description – Elements of Alternative 5 would be constructed over an approximately 24-month schedule. Construction would be performed in a manner that maintains ongoing terminal operations with one berth shut down at a time to allow for operations to continue. Under the proposed lease amendment, operation of the proposed facility after modification would now continue until December 31, 2038. The proposed modifications include improvements to and expansion of the existing Everport Container Terminal currently in operation at Berths 226-236. The primary components include the following:

- Dredging and installing king piles and sheet piles at Berths 226-229 and Berths 230-232;
- Disposal of dredged materials (30,000 cubic yards from Berths 226-229 and 8,000 cubic yards from Berths 230-232) at an ocean disposal site (i.e., LA-2), an approved upland disposal facility, or a combination of the two;

- Addition of five new 100-foot gauge A-frame over-water gantry (wharf) cranes and raising up to five of the existing cranes;

- Addition of five AMP vaults at Berths 226- 232;

- Construction of one additional rail track at the TICTF to increase the capacity of the Everport portion of the on-dock railyard;

- Development of approximately 1.5 acres of vacant land as new backlands and development of approximately 22 acres as new backlands with the relocation of the main gate. The development of the 22 acres would require closure (vacation) of streets within this backlands expansion area and demolition of existing structures; and

- Lease extension by 10 years for continued operations from December 31, 2028, to December 31, 2038.

ENVIRONMENTAL ASSESSMENT:

CEQA Responsibilities - The Harbor Department is the CEQA lead agency for the proposed Project. As such, the Board is responsible for reviewing and considering the Final EIR (Transmittal 1) and, at its discretion, certifying that the Final EIR has been completed in accordance with CEQA, the State CEQA Guidelines, and the Los Angeles City CEQA Guidelines; has been presented to the Board for review and the Board considered the information contained in the Final EIR, and that it reflects the independent judgment and analysis of the Harbor Department. Certification of the Final EIR must precede the project approval. Project approval requires that the Board first independently review and certify the Final EIR as adequate; then adopt the FOF for Alternative 5 (Transmittal 2) on the significant environmental effects and the feasibility of mitigation measures and alternatives; adopt a SOC for Alternative 5 (included in Transmittal 2); and adopt a MMRP (Transmittal 3).

Scope and Content of Environmental Document - The Draft EIR, released April 20, 2017, incorporates, as appropriate, information received on the Notice of Preparation (NOP) for the proposed Project, assesses environmental impacts of the proposed Project, and analyzes alternatives and mitigation measures to reduce or avoid significant environmental effects. The Final EIR clarifies and amplifies the Draft EIR, incorporates modifications and corrections, contains responses to all public comments made on the Draft EIR, and contains records of the public process.

Intended Uses of the EIR - The EIR informs public agency decision-makers and the general public of the significant environmental effects of the proposed Project, recommends mitigation measures to minimize the significant effects, and describes a

reasonable range of potentially feasible alternatives to the proposed Project, including Alternative 5 which is being recommended for adoption in lieu of the originally proposed Project. The EIR assesses the potential impacts, including unavoidable adverse impacts and cumulative impacts, related to the originally proposed Project and its alternatives, including Alternative 5. The analysis in the EIR supports future potential discretionary actions of the Board and the permitting/approval process of all agencies whose discretionary approvals must be obtained for particular elements of the Project. For the Harbor Department, these actions include but are not limited to: issuance of coastal development permits, issuance of engineering permits, and approval of lease amendments.

Environmental Documentation Process and Public Involvement - The proposed Project was subject to the required environmental documentation process that included public disclosure as required by CEQA. The procedural steps of the process are described below.

1. Notice of Preparation (NOP). In accordance with the Los Angeles City CEQA Guidelines, Article VI, Section 1.5 and the State CEQA Guidelines, Section 15082, the responsible agencies, participating City agencies, and other concerned parties were consulted through an NOP released in October 2014 and public scoping meeting held on November 13, 2014 in the Board Room. No comments were received during the scoping meeting and a total of ten written comment letters were received from various agencies and the public during the comment period, which closed on November 24, 2014.

   Copies of the NOP were available for review online at www.portoflosangeles.org, at the City of Los Angeles Harbor Department Environmental Management Division office, and at the Los Angeles San Pedro Branch and Wilmington Branch Libraries.

2. Draft EIR. The Draft EIR was released for public review on April 20, 2017. It was made available on the Port of Los Angeles website, at local libraries, and mailed directly to over 100 interested parties. The 45-day comment period closed on June 5, 2017.

   Public notices of availability stating that the Draft EIR was available for review were published in six newspapers: Los Angeles Times, Torrance Daily Breeze, Long Beach Press Telegram, Random Lengths, Metropolitan News Enterprise and HOY.

   A public hearing was held on May 10, 2017, in the Board Room to present the findings of the environmental analysis and accept oral comments. Four oral comment were received at the public hearing. A total of 21 written comments were received from various agencies and the public during the 45-day public comment period.

3. Responses to Comments. As required by Public Resources Code Section 21092.5, all public responsible and trustee agencies who commented on environmental issues in the Draft EIR were provided with proposed responses to those comments 10 days prior to the Final EIR being submitted to the Board for certification.

4. Final EIR. In accordance with the Los Angeles City CEQA Guidelines, Article I, and the State CEQA Guidelines, Section 15088, comments received on the Draft EIR were evaluated. The comment letters and responses to comments, along with minor modifications to the Draft EIR are presented in the Final EIR. The Final EIR was completed in early September 2017.

Findings and Conclusions - The Final EIR, FOF and SOC, transmitted herewith, identify major findings and conclusions, including a recommendation that Alternative 5 be approved in lieu of the originally proposed Project, a discussion of areas of environmental concern, feasible mitigation measures, and unavoidable impacts. The discussion below summarizes the proposed Findings of Facts for the Board's consideration.

1. Areas of Environmental Concern. Through the public environmental review process, the following areas of environmental concern were identified. These potential impacts and others were assessed in the Final EIR. The impacts associated with the proposed Project are discussed in detail, by resource area. The Final EIR concluded that the following environmental resources would remain significant and unavoidable: air quality, biological resources, cultural resources, and greenhouse gas emissions. These conclusions do not change with the selection of Alternative 5 as the Project.

2. Alternatives. A total of five alternatives to the proposed Project were considered during preparation of the EIR. Alternative 5 is highlighted below as it has been recommended for approval instead of the originally proposed project.

    a) Project with Expanded On-Dock Railyard Alternative (Alternative 5). The Expanded On-Dock Rail Alternative includes improving Berths 226-229, Berths 230-232, backland improvements and an additional on-dock rail track at the TICTF. Under this alternative, there would be two operating berths after construction, the same as the proposed Project. This alternative would require the same dredging as the proposed Project and is expected to operate at its maximum capacity of approximately 2,379,525 TEUs by 2038, the same as the proposed Project. Under this alternative, 208 vessels would call on the terminal by 2038, the same as the proposed Project.

3. Environmentally Superior Alternative. CEQA requires identification of the Environmentally Superior Alternative. The environmentally superior alternative was determined based on a ranking system that assigned numerical scores comparing the impacts under each resource area for each alternative relative to the proposed Project

for CEQA. Chapter 6 of the Draft EIR presents a comparison of the proposed Project and each alternative by resource area with significant and unavoidable impacts.

The No Project Alternative is identified as having the fewest impacts because no proposed project-related actions would occur. However, the CEQA Guidelines, Section 15126.6(e) requires that in cases where the No Project Alternative is determined to be the environmentally superior alternative, another alternative must be identified as environmentally superior.

As such, the Reduced Project: No Backland Improvements Alternative is identified as environmentally superior because it would not result in impacts related to cultural resources (historic and archaeological), and would not increase the throughput capacity of the terminal which would have been achieved by allowing larger ships to visit the terminal. Therefore, in accordance with CEQA, Alternative 4 is deemed to be environmentally superior. However, it would not achieve the same level of operational efficiency achieved by Alternative 5. While Alternative 4 would somewhat reduce the impacts related to air pollution and greenhouse gas emissions, adoption of Alternative 5 would accomplish the proposed Project goals and objectives associated with optimizing the use of existing land at the Everport Container Terminal, improving backland capacity, and maximizing container land use and operations. Alternative 5 achieves the same objectives of the proposed Project although construction impacts would be slightly higher and the overall cost of the project would be a little bit more than with the proposed Project, while reducing the overall operational air quality and traffic impacts to the region.

For the reasons discussed above and in the attached FOF, staff recommends that the Board: 1) find that Alternatives 1 through 4 do not fully meet Project objectives and/or do not result in reduction or avoidance of environmental effects relative to the Project; and 2) approve Alternative 5 as described in the Final EIR. Alternative 5 meets all of the Project objectives while reducing on-road truck trips through the incorporation of an additional rail track at the TICTF.

4. Proposed Mitigation Measures. In accordance with the provisions of the Los Angeles City CEQA Guidelines, Article I, the State CEQA Guidelines Section 15091, and the information contained in the EIR, changes or alterations have been required in, or incorporated into the project as recommended for approval (Alternative 5) in the form of feasible mitigation which substantially lessen or avoid significant adverse environmental impacts identified in the EIR. Further, certain mitigation measures were modified/strengthened or added based on public comments received on the Draft EIR.

   Mitigation measures contained in the EIR would be incorporated as appropriate in permits, such as, engineering specifications, engineering construction permits, real estate entitlements, and/or coastal development permits for the proposed Project. All

mitigation measures, lease measures and any standard conditions of approval can be found in the MMRP.

5. Unavoidable Significant Adverse Impacts. Significant impacts of Alternative 5 that could not be reduced below a level of significance are described in the FOF with findings for each impact. The following impact areas could not be mitigated to a level of insignificance under CEQA:

    - Air Quality
    - Biological Resources
    - Cultural Resources
    - Greenhouse Gases

    Cumulative Impacts. Alternative 5 was analyzed in conjunction with other related projects in the area for its potential to contribute to significant cumulative impacts. Alternative 5 would result in cumulatively considerable contributions to significant cumulative impacts related to aesthetics, air quality and meteorology, biological resources, greenhouse gas emissions, and noise under CEQA after mitigation.

    Environmental Justice. Although not required pursuant to CEQA, the EIR includes an environmental justice analysis pursuant to NEPA, which assesses the potential for actions to have disproportionately high and adverse environmental and health impacts on minority and low-income populations. Significant impacts related to air quality would result in disproportionately high and adverse effects on minority and low-income populations.

6. Overriding Considerations. Pursuant to Public Resources Code Section 21081(b), no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects unless the agency makes the specific findings discussed above with respect to each significant impact and finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects. The Statement of Overriding Considerations must identify the substantial adverse environmental impacts that cannot be mitigated or avoided; make recommendations, that the project or alternatives be approved as proposed; and the reasons why, if in the opinion of the decision-making body, the project warrants approval despite such consequences or recommendations.

    The Draft FOF and SOC recommended by staff is transmitted for Board consideration and adoption. Staff, in recommending the proposed Project for approval, has identified specific environmental, economic, legal, social, technological and other Project benefits. In summary, Alternative 5 provides the following benefits:

- **Fulfills Harbor Department's legal mandates and objectives.** Alternative 5 would fulfill the Harbor Department's legal mandate under the Port of Los Angeles Tidelands Trust (Los Angeles City Charter, Article VI, Sec. 601; California Tidelands Trust Act of 1911) to promote and develop commerce, navigation and fisheries, and other uses of statewide interest and benefit including industrial and transportation uses and the California Coastal Act (PRC Division 20, Section 30700, et seq.), which identifies the Port and its facilities as a primary economic/coastal resource of the state and an essential element of the national maritime industry and obligates the Harbor Department to modernize and construct necessary facilities to accommodate deep-draft vessels and to accommodate the demands of foreign and domestic waterborne commerce and other traditional and water-dependent and related facilities in order to preclude the necessity for developing new ports elsewhere in the state. Further, the California Coastal Act provides that the Harbor Department should give highest priority to the use of existing land space within harbors for port purposes, including, but not limited to navigational facilities, shipping industries and necessary support and access facilities. The proposed Project would also meet the Harbor Department's strategic green growth objectives by maximizing the efficiency and the capacity of facilities while applying mitigation measures that adhere to and/or exceed the San Pedro Bay Clean Air Action Plan (CAAP) requirements and raise environmental standards.

- **Optimizes land use.** Alternative 5 would maximize the utilization of Port lands by increasing the cargo handling efficiency of an existing container terminal to accommodate the demands of foreign and domestic waterborne commerce.

- **Accommodate projected changes to cargo ship fleet mix.** Alternative 5 would upgrade an existing facility to accommodate the servicing of larger container ships which are projected to enter the fleet mix calling at the Port in the future.

- **Fosters economic growth.** Alternative 5 would augment local employment and business opportunities by directly supporting numerous short-term construction and long-term operational jobs and a variety of indirect jobs related to both the construction and operational phases.

In summary, Alternative 5 would allow the Harbor Department to meet its legal mandates to accommodate growing international commerce, while maintaining compliance with important environmental programs and policies. The Board hereby finds that the benefits of the proposed Project described above outweigh the significant and unavoidable environmental effects and are therefore considered acceptable.

7. Areas of Controversy on Draft EIR. It is important for the Board to be informed as to the areas of controversy associated with the EIR. The areas of controversy have been identified through oral and written comments received on the proposed Project as part of the environmental review and planning processes. The discussion below provides a general overview of the areas of concern identified that staff believes remain controversial. Specific details on issues raised by commenters and the responses to those comments are included in the Final EIR.

   During the public review period, comments were raised over the proposed Project's significant air quality impacts, potential impacts to environmental justice communities, the lack of inclusion of the electric dredge for use during construction, the lack of inclusion of an analysis of potential energy consumption impacts, etc. These comments also apply to Alternative 5. Additional mitigation measures were suggested related to locomotives, financial incentives, increased compliance with the Vessel Speed Reduction Program (VSRP), and use of cleaner-tiered vessels. However, additional mitigation measures in these areas proved to be technologically and economically infeasible as detailed in the Final EIR with the exception of the electric dredge which has now been included if available. The inclusion of the electric dredge also applies to Alternative 5 as the MMRP will not change as a result of recommending a project alternative.

8. EIR Certification and Project Approval. In light of these findings and conclusions, staff recommends certification of the Final EIR as being prepared in accordance with CEQA and implementing guidelines, and recommends approval of Alternative 5 and adoption of all feasible mitigation measures and lease measures.

9. Implementation of Mitigation. When making the CEQA findings required by Public Resources Code Section 21081(a), a public agency shall adopt a reporting or monitoring program in accordance with Public Resources Code Section 21081.6 for changes to the proposed Project which it has adopted or made a condition of Project approval in order to mitigate or avoid significant effects on the environment. A MMRP is transmitted for Board consideration and adoption. In addition, should the Board elect to approve the proposed Project or an alternative other than Alternative 5, the mitigation measures contained in the EIR would be incorporated as appropriate in permits, such as, engineering specifications, engineering construction permits, real estate entitlements, and/or coastal development permits for the proposed Project (Recommendation 12). The proposed Findings of Fact and Statement of Overriding Considerations would also need to be revised.

10. Record of Proceedings. When making CEQA findings required by Public Resources Code Section 21081(a), a public agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based. These records are in the care of the Director of

Environmental Management, City of Los Angeles Harbor Department, 222 W. 6th Street, San Pedro, California 90731.

11. Notice of Determination. In accordance with Los Angeles City CEQA Guidelines, Article I, and the State CEQA Guidelines Section 15094, a Notice of Determination will be filed with the County and City Clerk's Office after project approval. Public Resources Code Section 21167(c) provides that any action or proceeding alleging that an EIR does not comply with the provisions of CEQA shall be commenced within 30 days after filing the Notice of Determination.

FINANCIAL IMPACT:

Certification of the Final EIR and approval of Alternative 5 is an administrative action that would pave the path forward for implementation of the Project. This Board action does not authorize any expenditures related to the project nor does it commit the Harbor Department to complete the project as ultimately approved, if any. Award of any capital construction contract related to the project, as will any approval of a lease extension with Everport under its existing Permit No. 888, would require Board approval under separate future actions. Consultant costs to complete the Everport EIR is estimated at $2,426,461.87 (not including Harbor Department staff time and materials). A total of $58,179,775 is programmed in the Port's 10-year Capital Improvement Program for Everport improvements which also includes the cost to complete the EIR/EIS. The Harbor Department's financial return on the project will be fully detailed in any future Board actions requesting approval of capital expenditures and/or lease extension under Permit No. 888. However, preliminary financial analysis indicates the undertaking of Alternative 5 would likely conform to the Harbor Department's Board adopted rate of return policy. Aside from mitigation and lease measures that are the responsibility of the tenant as outlined in the MMRP, the project, as ultimately approved, is the financial responsibility of the Harbor Department.

SUBJECT: **FINAL ENVIRONMENTAL IMPACT REPORT FOR THE BERTHS 226-236 EVERPORT CONTAINER TERMINAL IMPROVEMENTS PROJECT**

CITY ATTORNEY:

Based upon the information presented to the City Attorney's Office, the Board may certify that the EIR for the Berths 226-236 Everport Container Terminal Improvements Project have been completed in accordance with CEQA.

TRANSMITTALS:

1. Final Environmental Impact Report (FEIR)
2. Findings of Fact and Statement of Overriding Considerations (FOF and SOC)
3. Mitigation Monitoring and Reporting Program (MMRP)

FIS Approval: MB **(initials)**
CA Approval: CBB **(initials)**

Lisa Ochsner for

CHRISTOPHER CANNON
Director of Environmental Management

Michael DiBernardo

MICHAEL DiBERNARDO
Deputy Executive Director

APPROVED:

Mark Blevins FOR

EUGENE D. SEROKA
Executive Director

CC:yo
AUTHOR: T. Tisopulos
APP No.: 160420-056

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Berths 226 to 236 [Everport]
Container Terminal Improvements Project

Final Environmental Impact Statement/
Environmental Impact Report
And
Draft General Conformity Determination

September 2017

Prepared by:

Los Angeles Harbor Department
Environmental Management Division
425 S. Palos Verdes Street
San Pedro, CA 90731

With assistance from:
CDM Smith

APP No. 131015-136
SCH No. 2014101050

THE PORT OF LOS ANGELES

US Army Corps of Engineers

TRANSMITTAL 1

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Chapter 1
Introduction

1.1 Final EIS/EIR Organization

This chapter presents background and introductory information for the proposed Project, Berths 226-236 [Everport] Container Terminal Improvements Project, located on Terminal Island within the Port of Los Angeles (Port). Additionally, this chapter discusses general changes and modifications made to the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR), which are mostly editorial in nature. Chapter 2, "Responses to Comments," presents information regarding the distribution of and comments on the Draft EIS/EIR, and the responses to these comments. Chapter 3, "Modifications to the Draft EIS/EIR," presents the modifications to the Draft EIS/EIR.

This Final EIS/EIR has been prepared in accordance with the requirements of the National Environmental Policy Act (NEPA) (42 United States Code [USC] 4341 et seq.), and in conformance with the Council for Environmental Quality (CEQ) Guidelines and the United States Army Corps of Engineers (USACE) NEPA Implementing Regulations. The document also fulfills the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR] 15000 et seq.). The USACE is the NEPA lead agency for this proposed Project and the Los Angeles Harbor Department (LAHD) is the CEQA lead agency.

1.2 Existing Conditions

1.2.1 Regional Context

The Port Complex, which includes the Port of Los Angeles and the Port of Long Beach, is located in the San Pedro Bay, which is approximately 20 miles south of downtown Los Angeles and serves as one of the nation's primary gateways for international trade (and the primary gateway for Asian-based trading partners). International trade is a key economic engine for the region and the country. The Port Complex serves as a vital link in the goods movement chain delivering goods for local markets as well as those shipped by truck and rail throughout the country. Approximately half of the cargo coming through the Ports is delivered by truck to the regional market, which is an area roughly 500 to 700 miles from the Port Complex. The local freeways that directly serve the Port Complex are Interstate (I) 110, I-710, State Route (SR) 47, and SR-103. The Alameda Corridor is the primary rail line between the Port and downtown Los Angeles railyards (Union Pacific [UP] East LA Yard and Burlington Northern Santa Fe [BNSF] Hobart Yard). Other rail lines extend from the downtown area north and east.

1.2.2 Project Setting

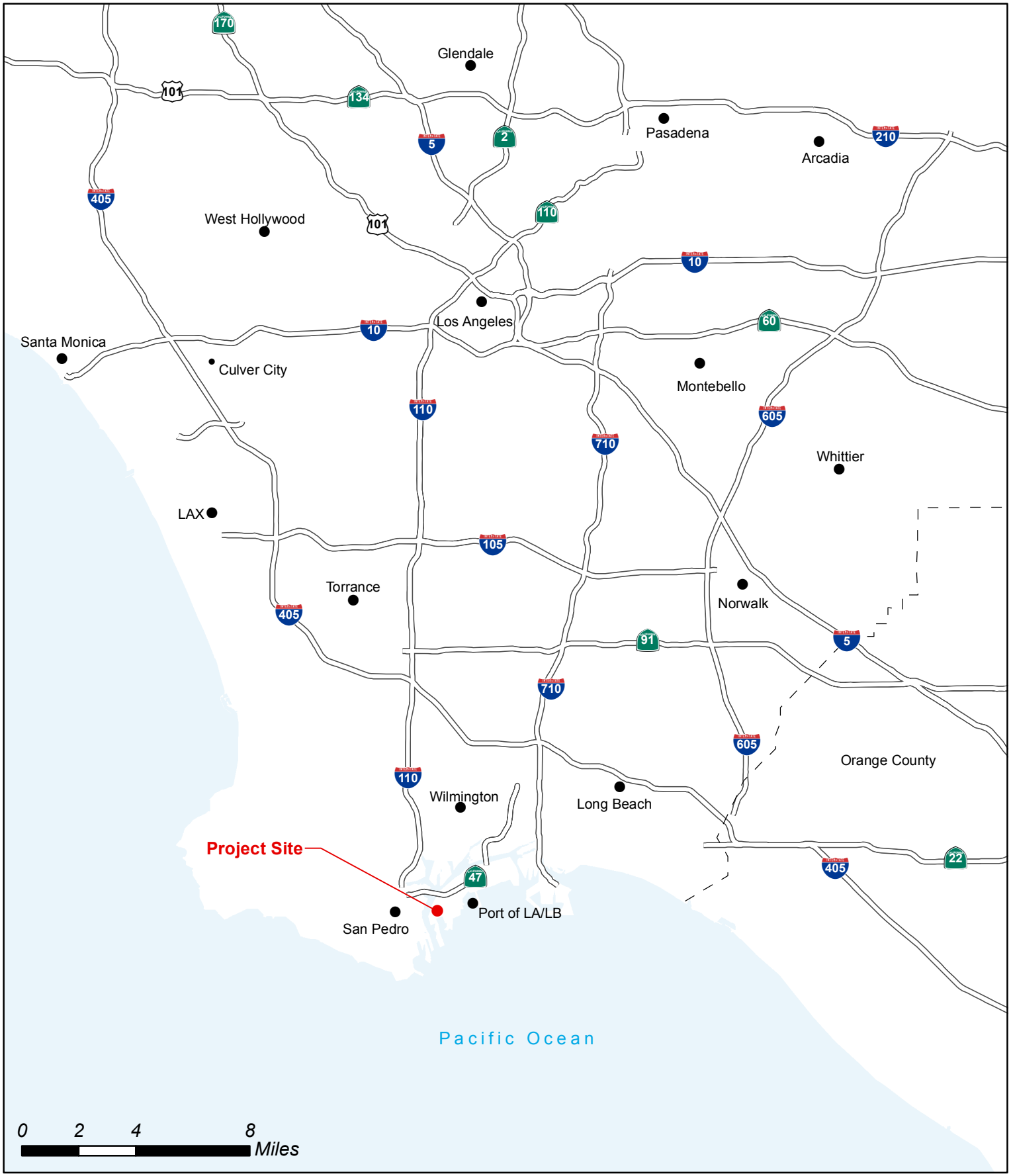
The Port consists of 7,500 acres and 43 miles of waterfront and is designed for movement of international goods and services. The Port is administered by LAHD under the California Tidelands Trust Act of 1911. LAHD is chartered to develop and operate the Port to benefit maritime uses, and it functions as a property owner by leasing Port properties to more than 300 tenants. With 23 major cargo terminals, including dry and liquid bulk, container, breakbulk, automobile, and passenger facilities, the Port handled about 176.5 million metric revenue tons of cargo in fiscal year 2013/2014 (July 2013–June 2014) (POLA, 2015). Of the 23 major cargo terminals, nine are container terminals and include 86 container cranes. In addition to cargo business operations, the Port is home to commercial fishing vessels, a shipyard, a boat repair facility, and recreational, community, and educational facilities.

1.2.3 Project Site and Surrounding Uses

The Project site is located at 389 Terminal Way on Terminal Island in the Port of Los Angeles within the Port of Los Angeles Community Plan area of the City, and within the County of Los Angeles, California. The Project site is near the communities of San Pedro and Wilmington and is approximately 20 miles from downtown Los Angeles (Figure 1-1). The site is generally bounded on the west and northwest by the Main Channel; to the north by State Route 47 and the Yusen Terminals, Inc. (YTI) Container Terminal at Berths 212-224; to the east by Los Angeles Export Terminal (LAXT), PBF (formerly ExxonMobil) Inland Tanks facility, and U.S. Customs House; and to the south by the PBF Energy (formerly ExxonMobil) liquid bulk terminal at Berths 238-240, Cannery Street, TriMarine Seafood and both vacant and developed land south of Cannery Street (Figure 1-2). Land uses in the vicinity of the Project site support a variety of cargo handling operations (including container, liquid bulk, dry bulk) commercial fishing, seafood processing, maritime support, and ship repair.

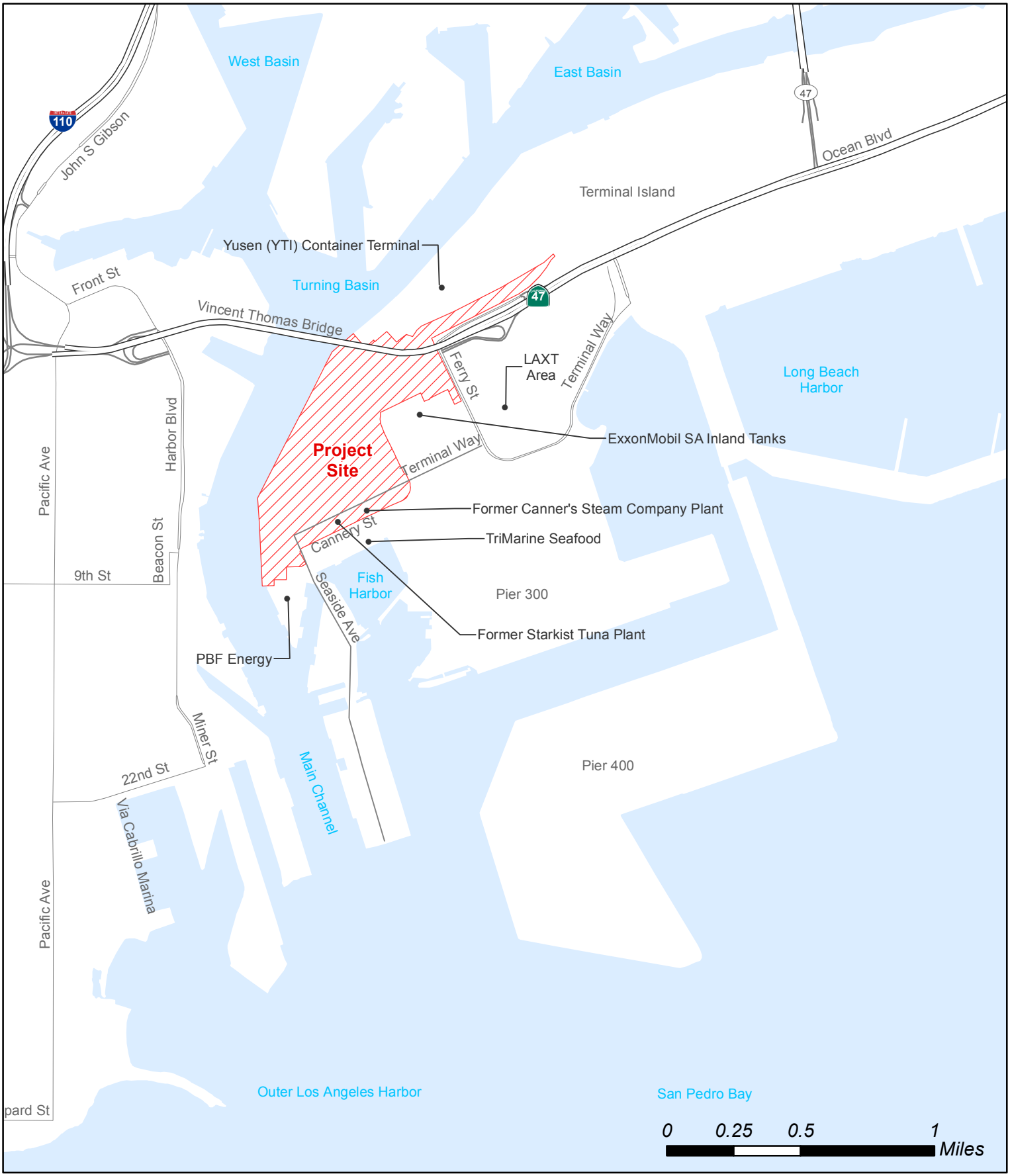
The existing 205-acre container terminal at the Project site (Berths 226-236) is operated by Everport Terminal Services Inc. (ETS) (a wholly owned subsidiary of Evergreen Marine Corporation). ETS is the permit holder under a lease agreement (Permit No. 888, as amended and hereafter referred to as 'the lease') between LAHD and ETS. The main terminal under the current lease agreement totals approximately 180 acres that includes approximately 20.5 acres associated with the existing on-dock railyard behind the YTI Container Terminal, known as the TICTF, which is shared between the YTI and Everport terminals. In addition to the 180 acres under lease, ETS has an existing space assignment for 25 acres of backland area behind Berths 232-236.

The proposed Project would increase the existing terminal size from 205 acres to approximately 229 acres by incorporating into ETS's lease an additional 23.5 acres (consisting of a 1.5-acre parcel and a 22-acre parcel). The 1.5-acre parcel (located adjacent to the 25-acre space assignment and PBF tank facility) that is being proposed for development as backlands is vacant and adjacent to the existing terminal, but separated by a chain-link fence. The 22-acre area proposed for development as backlands and the relocation of the main gate (located immediately south of the existing terminal boundary) is currently developed with various structures (including, but not limited to, buildings associated with the former StarKist Tuna Plant, the former Canner's Steam Company Plant, and an electrical substation), vacant parcels, and portions of Terminal Way, Barracuda Street, Tuna Street, and Ways Street. The development of the



Source: U.S. Census Bureau, Geography Division, 2010

Figure 1-1
Regional Location Map



Source: U.S. Census Bureau, Geography Division, 2010

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Figure 1-2
Project Vicinity Map

Berths 226-236 [Everport] Container Terminal Improvements Project

22 acres would require closure (vacation) of streets within that portion of the Project site and demolition of the existing buildings. The electrical substation will remain.

1.2.4 Historic Use of the Project Site

In 1914, the Port of Los Angeles began dredging what would become Fish Harbor, a specialized area for fish processing and canning at Terminal Island. It was operational by 1915, and most of the Port's canneries moved to the new harbor, making tuna fishing and processing the most prominent activity on that part of the island. By the 1920s, 11 canneries operated from the Port, served by a large fleet of fishing vessels and employing 1,800 cannery workers and 4,800 fishermen. The workforce was diverse and included a large number of Japanese and Japanese Americans, many of whom lived on the island just north of Fish Harbor where they formed a distinct dialect and culture unique to the Port. A small but vigorous commercial core emerged on Tuna and Cannery Streets, and by the 1920s the block of Tuna Street between Cannery and Fish Harbor was lined with restaurants, barber shops, pool halls, markets, clothing stores, hardware stores, and grocery and dry goods stores.

Fish Harbor continued to expand through the 1930s and by 1940 the Japanese American population had grown to 3,000. Following the bombing at Pearl Harbor however, the Port's Japanese Americans were forcibly removed from their homes on Terminal Island and taken to internment camps. The Navy bulldozed their homes and most of the businesses, leaving nothing to return to at the war's end. After World War II, fish canneries expanded their operations throughout Fish Harbor, particularly French Sardine Company, which constructed new facilities on Tuna Street and the east side of Fish Harbor. Across Terminal Island, the Port of Los Angeles expanded into the now-vacant land that had once contained hundreds of Japanese and Japanese-American residences, significantly changing the function and character of the area. The once-bustling commercial district along Tuna Street now primarily housed canneries and other fishing-related businesses.

This growth was short-lived however, and by the 1960s many of the larger canning operations (i.e., Van Camp and StarKist) began establishing other, more cost-effective, canneries overseas. By 1975, most of the Port's canneries had been bought by multinational corporations, and by the mid-1980s many of their operations had moved out of Los Angeles. The last plant, Chicken of the Sea, closed in 2001. Since that time, many of the buildings associated with the once-vibrant fishing industry at Fish Harbor have been demolished or abandoned.

The Everport Container Terminal gradually developed through infill between 1971 and 1988. Prior to this, it was used for shipping, but had slips for shipping boats with adjacent warehouse buildings (no longer extant).

The 1.5-acre area was part of the former ExxonMobil oil terminal, which was initially constructed in 1925. Historic photos indicate the 1.5-acre parcel housed oil tanks beginning in 1925 until they were demolished sometime between 1979 and 1987. The lot has been vacant since this time.

1.2.5 Existing Terminal Facilities and Operations

1.2.5.1 Terminal Facilities

The 205-acre Everport Container Terminal consists of a cargo ship loading/unloading area, a large container handling and storage yard, and container terminal buildings and areas. In addition, the Everport Container Terminal shares an on-dock rail facility (the TICTF) with the YTI Container Terminal (Figure 1-3). The Everport Container Terminal is fully paved (i.e., there are no pervious areas). There are eight existing A-frame over-water gantry (wharf) cranes located at the Everport Container Terminal. The existing eight wharf cranes consist of three smaller 100-gauge Bardella cranes and five larger 100-gauge cranes manufactured by ZPMC. The three smaller wharf cranes are located along the southern portions of the existing wharves, and the five larger wharf cranes are located along the northern portion of the wharves.

Alternative Maritime Power (AMP), which is the technique of utilizing shoreside electrical power from the City of Los Angeles Department of Water and Power's power grid to operate the container ships when they are berthed at an appropriately equipped wharf, has been installed and is currently in use at Berth 227 (two existing AMP vaults) and Berth 230 (one existing AMP vault). AMP is used to help the Port meet California Air Resources Board (CARB) regulations for existing and future operations.

The TICTF, which opened in 1997, currently serves the Everport Container Terminal as well as the YTI Container Terminal in the Project area. The TICTF features eight rail tracks, each approximately 2,300 feet long. The Everport Container Terminal currently operates the four southernmost rail tracks within the TICTF on-dock railyard (the YTI Container Terminal operates the four northernmost rail tracks within TICTF). Figure 1-3 shows the existing TICTF on-dock railyard associated with the Everport Container Terminal.

1.2.5.2 Terminal Operations

The existing Everport Container Terminal uses traditional cargo handling methods, as compared to automated methods, to service containerized cargo. Once containers have been off-loaded from a ship or received through the gates on trucks and trains, the containers are stored and moved around the backlands area of the terminal using diesel-powered cargo-handling equipment including diesel powered rubber-tire gantry cranes (RTGs) and/or diesel-powered top handlers and yard tractors. Through the use of this cargo handling equipment, containers are stored by either stacking containers on top of each other, up to five containers high with the bottom container placed directly on the ground, or with a container stored directly on a chassis (trailer). All of the unloading/loading equipment used in the backland operations is performed and operated by workers. Outbound containers are transported by both truck and rail. Containers may be forwarded to peel-off yards upon being off-loaded from a ship, where they would subsequently be transported by truck and rail.

Aerial Source: County of Los Angeles, 2012

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Figure 1-3
Project Site Map

Existing Throughput and Vessel Calls

In 2013, the Everport Container Terminal moved 1.24 million TEUs and had 166 vessel calls. The majority of vessels calling at the terminal were 2,000- and 6,000-TEU-capacity vessels. No vessels over 8,000-TEU-capacity called on the Everport Container Terminal in 2013, as the existing depth of berths limits the vessel sizes to 8,000 TEUs. The terminal handled a maximum of two vessel calls in a peak day. With existing infrastructure, maximum throughput capacity at the Everport Container Terminal is approximately 1,818,000 TEUs annually.

Ship Operations

Currently the terminal can berth up to three smaller vessels along the two operating berths. However, the occasions when three ships are berthed simultaneously are rare, and the terminal primarily handles up to two vessels at a time. To accommodate berthing, tugboat operations are required. For the Everport Container Terminal, two tugs generally are required during docking and undocking, for a total of four tugs per vessel call. In the case of the 2,000-TEU class vessels, one tug is required each for ship docking and undocking, for a total of two tugs per call.

Transportation Modes

Currently, about 24.8 percent of Port-wide cargo throughput passes through on-dock rail facilities, 10.5 percent through off-dock rail facilities, and the remaining 64.7 percent via truck to the local and regional markets, including transload facilities. However, the mode split (percent of containers that are conveyed by different transportation modes such as rail or truck) at individual terminals varies. Mode splits differ from terminal to terminal on the basis of the existence and capacity of a terminal's on-dock rail facility, as well as the demands of shipping lines, which are sensitive to the receiving market. Further, the percentage of cargo from a terminal that can be transported via an on-dock railyard is limited because on-dock railyards assemble trains that are destined for a single destination, and only a limited number of containers handled by a terminal have a common rail destination. In 2013, mode splits at the terminal were 18.6 percent through the TICTF, 4.3 percent through off-dock rail facilities, and 77.1 percent by truck to local and regional markets, including transload facilities.

Truck Operations

The Everport Container Terminal's 2013 throughput required a total of 1,112,735 annual one-way truck trips, with 4,505 daily one-way truck trips in the peak month. Those trips included cargo hauled entirely by truck (principally within Southern California, with some trips to and from northern California, Arizona, Nevada, and Utah) and intermodal cargo bound for, or coming from, locations farther east. Of the approximately 956,755 TEUs transported by trucks, approximately 53,791 TEUs were intermodal cargo trucked between the terminal and off-dock railyards.

Rail Operations

The Everport Container Terminal's 2013 throughput required an annual average of 1.6 trains per day, and an average of 1.8 trains per day during the peak month. The portion of the TICTF on-dock railyard that serves the Everport Container Terminal handled 230,227 TEUs (124,674 TEU imports and 105,553 TEU exports) in 2013. Containers are hauled by yard tractors between the vessel berths and the on-dock railyard. In addition to the throughput handled by TICTF, off dock yards handled 53,791 TEUs. At the railyard,

containers are lifted on and off railcars by top handlers. Both inbound and outbound trains carry an average of the equivalent of 270 40-foot containers; however, the maximum number of containers a train can handle is based on weight considerations. Trains usually carry a mix of 20- and 40-foot containers.

Rail operations at the TICTF involve a number of entities. As the terminal operator, ETS moves containers to and from the on-dock facility. Containers are off-loaded and loaded directly from and onto train components known as wells, with each well capable of carrying two 40-foot containers stacked (i.e., equivalent to four TEU's). Five wells make up a railcar, and each railcar is then coupled with other railcars traveling to the same destination. The coupled railcars are called a unit train. Unit trains vary in length between 21 and 28 railcars (105 and 140 wells). The average on-dock train length at the Everport Container Terminal is 25 railcars (125 wells), or 7,500 feet. These unit trains are usually built by Pacific Harbor Line (PHL). PHL is a third-party, independent rail company that provides rail transportation, yard switching, maintenance, and dispatching services to the Port Complex.

PHL manages all rail dispatching and switching functions at the on-dock railyards within the Port Complex, including:

- scheduling and overseeing all train movements;
- organizing railroad cars carrying containers of imported goods and switching them onto various tracks to form unit trains;
- breaking down unit trains arriving at the ports, switching railroad cars onto various tracks and distributing them to nine marine terminals where containers are loaded onto ships for export;
- maintaining 60 miles of railroad tracks within the Port Complex; and
- breaking and storing railroad cars awaiting dispatch.

The Port is served by two Class 1 railroads, BNSF and UP, often referred to as the "main line" or "line-haul" rail companies. After PHL has built a unit train, BNSF or UP will hook up their line-haul locomotive(s) to the train and pull the train out of the on-dock railyard on to the main-line tracks to the eventual destination. PHL locomotives will occasionally pull portions of a unit train out of the on-dock facility to the near dock ICTF. A loaded double-stack train is typically pulled by three or four line-haul locomotives although it would be hauled by two or three smaller locomotives if PHL pulls the train.

PHL contracts with LAHD and the Port of Long Beach to operate the centralized traffic control (signaling) system. Agreements with BNSF and UP for international cargo are usually handled by the shipping lines. Many shipping lines have a contract with both BNSF and UP.

Cargo Handling Equipment

The existing fleet of cargo-handling equipment used at the Everport Container Terminal is as follows:

- 11 forklifts;
- 14 RTG cranes;
- 18 top handlers;

- 6 side picks; and
- 123 yard tractors.

Cargo-handling equipment have useful operating lives, which correspond to the period during which continued operation - with routine maintenance and periodic retrofits - is still cost-effective. At the expiration of useful operating lives or sooner if required by CARB, cargo-handling equipment would be replaced or modified to meet any newly adopted CARB standards.

Terminal Operating Hours

Currently, Everport Container Terminal operations occur six to seven days per week, and approximately 305 days per year, in two shifts per day (7:00 AM to 6:00 PM, and 6:00 PM to 3:00 AM). The Everport Container Terminal employs approximately 145 union labor employees per day on a typical day, and up to approximately 245 union labor employees under peak conditions.

1.3 Project Purpose

The LAHD operates the Port under the legal mandates of the Port of Los Angeles Tidelands Trust (Los Angeles City Charter, Article VI, Section 601) and the California Coastal Act (PRC Division 20 Section 30700 *et seq*.), which identify the Port and its facilities as a primary economic and coastal resource of the State of California and an essential element of the national maritime industry for the promotion of commerce, navigation, fisheries, and Harbor operations. Activities should be water dependent and the LAHD must give highest priority to navigation, shipping, and necessary support and access facilities to accommodate the demands of foreign and domestic waterborne commerce. The LAHD is chartered to develop and operate the Port to benefit maritime uses, and it functions as a landlord by leasing Port properties to more than 300 tenants.

1.3.1 CEQA Project Objectives

The underlying fundamental purpose and Project objective is to optimize the container-handling efficiency and capacity of the Port to accommodate the projected fleet mix of larger container vessels (up to 16,000 TEUs) that are anticipated to call at the Everport Container Terminal (i.e., Project site) through 2038. The fundamental purpose, in turn, gives rise to the following additional project objectives:

- Optimize the use of existing land at the Everport Container Terminal and associated waterways in a manner that is consistent with the LAHD's public trust obligations;
- Provide sufficient depth along Berths 226-229 and Berths 230-232 to ensure the terminal's ability to accommodate up to 16,000 TEU vessels anticipated to call at the terminal;
- Provide new cranes and raise existing cranes to efficiently service the larger container ships anticipated to call at the terminal;
- Improve the container terminal and container handling facilities to accommodate more efficient loading/unloading of the larger and increased number of ships anticipated to call at the terminal;
- Improve the container terminal backland capacity;

- Maximize container land use and operations at the Everport Container Terminal consistent with the Port Master Plan; and
- Promote the long-term development and growth of the Port.

1.3.2 NEPA Purpose and Need

The purpose of the proposed Project is to optimize marine shipping and commerce by upgrading the Everport Container Terminal's infrastructure in, over, and under water and increasing and improving terminal backlands to accommodate the projected throughput and fleet mix of larger container ships (up to 16,000 TEUs) that are anticipated to call at the terminal through 2038.

The proposed Project is needed for several reasons; however, it is primarily related to an increase in the size of vessels that will be entering the fleet mix throughout the life of the proposed Project. Forecasts show that vessel fleets calling at the Port of Los Angeles and the Everport Container Terminal would include larger vessels (up to 16,000 TEUs), and there is a need to improve Port facilities to accommodate larger vessels. The existing berths that serve the Everport Container Terminal are not deep enough to accommodate the projected fleet mix through 2038 (the existing berths can only accommodate up to 8,000 TEU vessels). These berths would be upgraded (deepened) as part of the proposed Project. In addition to existing berth depth restrictions, additional cranes are needed to efficiently load and unload the larger container ships. Finally, additional container yard backlands are needed to accommodate future operations and the projected Port-wide throughput.

1.3.3 Federal Scope of Analysis

In general, the scope of federal review for evaluating the potential impacts of a proposed project is focused on those aspects of the project that affect federal agency jurisdiction. USACE has jurisdiction over activities affecting navigable waters and other waters of the U.S., as well as transport of dredged material for the purpose of ocean disposal.

Under federal law, "the District Engineer should establish the scope of the NEPA document to address the impacts of the specific activity requiring the DA permit and those portions of the entire project over which the District Engineer has sufficient control and responsibility to warrant Federal review" (33 CFR Part 325, Appendix B).

USACE regulations identify four factors to be considered in determining "sufficient federal control and responsibility," which include:

1. whether or not the regulated activity represents merely a link in a corridor-type project;
2. whether there are aspects of the upland facility in the immediate vicinity of the regulated activity that affect the location and configuration of the regulated activity;
3. the extent to which the entire project would be within USACE jurisdiction; and
4. the extent of cumulative federal control and responsibility.

With respect to the first factor, the proposed Project is a container terminal improvement project, which consists of dredging, wharf improvements, addition of overwater cranes,

disposal of dredge material, including potential transport of dredged material for the purpose of ocean disposal, expansion of backlands, and closure of local street sections and rerouting of local traffic. Thus, the regulated activities (dredging, wharf improvements, overwater cranes and potential ocean disposal of dredged material) do not represent "merely a link" in a corridor-type project, such as a highway or a utility line crossing.

Considering the second factor, because the Everport Container Terminal is an existing terminal in the Port, there is a physical connection between the upland areas of the container terminal (the backlands and its portion of the TICTF railyard) and the adjacent wharves and associated cranes in and over waters of the U.S. that support the Everport Container Terminal's operations. While this factor might suggest expanding the scope of analysis to include the upland container yard/backlands, the existing Everport Container Terminal is a fully functioning container terminal that has been operating at this location for many years, and, as such, many of the upland/backland impacts that would or could occur at the site under the proposed Project represent non-jurisdictional activities or operations and the resultant impacts could occur regardless of whether activities regulated by the USACE, as proposed, are authorized. Therefore, the backlands are not considered to be within the Federal Scope of Analysis.

In evaluating the third factor, the extent of waters of the U.S. that would be affected by the proposed Project represents a relatively small portion of the approximately 229-acre Project area. The proposed dredging at Berths 226–229 would impact up to approximately 105,000 square feet (2.4 acres) and the dredging at Berths 230–232 would impact approximately 105,000 square feet (2.4 acres) of navigable waters of the U.S. The proposed wharf improvements (new king piles and sheet piles) would take place immediately adjacent to the existing wharf structure and could require access from navigable waters. The five new overwater cranes would be installed on existing crane rails and no direct impact to navigable waters of the U.S. would occur as a result; however, the proposed overwater cranes could affect navigable capacity in the Main Channel by increasing the number or cranes that extend over navigable waters. Based on the above, the USACE's has determined that the extent of the proposed Project within its jurisdiction is based on the area of navigable water potentially affected by the proposed Project (approximately 5.28 acres) and the upland area within 100 feet of the water's edge (wharf pier head line), the area on which the overwater cranes would be installed.

For the fourth factor, other than the requirement to obtain a Department of the Army (DA) permit, there is no other federal involvement on this site that would warrant broadening the federal scope of analysis, such as use, transfer, or sale of federal property; federal funding including cost sharing, guarantee, or financial assistance; or impacts to federally listed historic resources, threatened or endangered species, designated critical habitat, or other federally recognized natural resources. There is also no other federal agency that controls the environmental effects of land development on the upland portions of the Project area, and state and local regulations would control the design of the proposed Project. Further, the federal and non-federal portions of the proposed Project could take place independently of each other.

Based on USACE regulations, including the four factors evaluated above, the appropriate scope of analysis for the federal action consists of permanent and temporary, direct and indirect impacts to waters of the U.S. associated with dredging, dredged material disposal, installation of subsurface king piles and sheet piles, wharf improvements,

raising the heights of up to five of the existing overwater gantry cranes, five new overwater gantry cranes, and construction-related activities in uplands within 100 feet of the water's edge and which are directly traceable to the proposed in/over/under water work and structures. As such, the USACE has determined that construction activities which would take place within 100 feet of the water's edge and are required to complete work and structures in waters of the U.S. (e.g., electrical infrastructure and the travel zone for the new cranes along the existing crane rails) are included in the USACE's scope of analysis and under the USACE's federal control and responsibility.

Based on potential significant indirect and cumulative impacts that are directly traceable to jurisdictional work and structures in navigable waters of the U.S., which are associated with the proposed Project, the USACE is preparing an EIS for the proposed Project and its alternatives. While operational impacts in the uplands would occur outside the jurisdiction and permit authority of USACE, NEPA requires USACE to disclose potentially significant direct, indirect, and cumulative impacts occurring as a result of a proposed federal action. As such, the NEPA analysis herein evaluates construction and operational impacts that would occur within and outside jurisdictional areas of the terminal. Significance of the proposed Project or alternative under NEPA is defined by comparing the impacts of the proposed Project or alternative to the NEPA baseline (i.e., the Project increment). This represents the incremental difference between implementation of the proposed Project or alternative and the future conditions that are likely to occur without federal action, in this case, the issuance of the DA permit. However, the USACE permit decision, mitigation measures and special conditions would focus on direct impacts to the aquatic environment.

1.4 Proposed Project

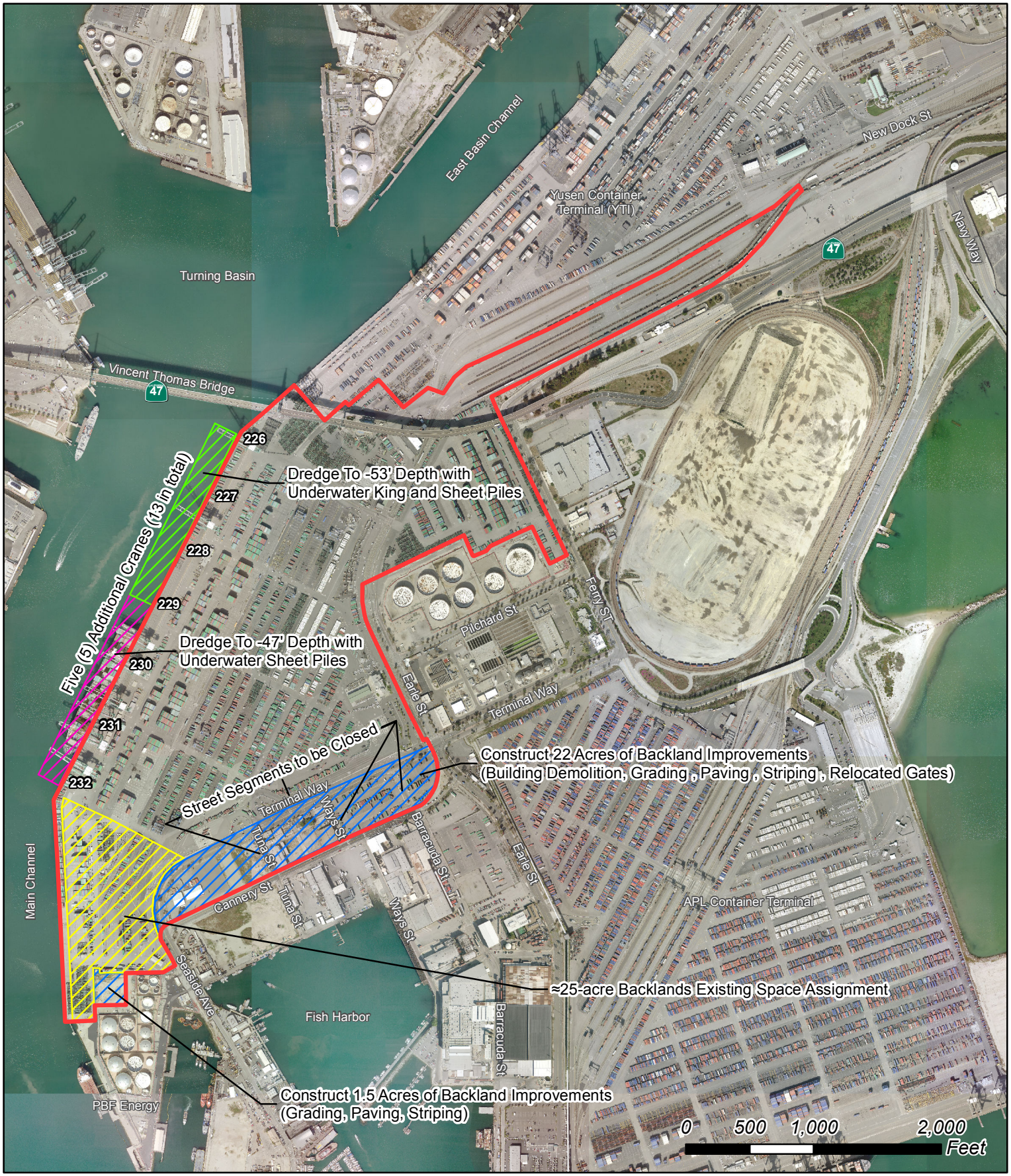
This section describes the proposed improvements to the Everport Container Terminal, the anticipated construction phasing, and the anticipated terminal operations once the improvements are completed. Figure 1-4 shows the Project site improvements.

1.4.1 Proposed Project Elements

1.4.1.1 Overview

The proposed Project would be constructed in one phase over approximately 24-months and the earliest it could begin would be in 2018. Construction would be performed in a manner that maintains ongoing terminal operations. Under the proposed lease amendment, operation of the proposed Project would continue until 2038. Below is a summary of the improvements that would occur at the terminal, with more detailed descriptions following.

The proposed Project includes improvements to and expansion of the existing Everport Container Terminal currently in operation at Berths 226-236 on Terminal Island in the Port of Los Angeles. This EIS/EIR evaluates the potential impact of the construction and operation of the proposed Project and the Project alternatives. The proposed Project includes:



Aerial Source: County of Los Angeles, 2012

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Figure 1-4
Proposed Project

Berths 226-236 [Everport] Container Terminal Improvements Project

- Dredging (including installation of king piles and approximately 1,400 linear feet of sheet piling to stabilize the wharf) at Berths 226-229 to a design depth of -53 feet mean low low water (MLLW) plus two feet of overdepth tolerance (for a total depth of -55 feet MLLW) to accommodate larger ships (the existing design depth is -45 feet MLLW);
- Dredging (including installation of approximately 1,400 linear feet of sheet piling to stabilize the wharf) at Berths 230-232 to a design depth of -47 feet MLLW plus two feet of overdepth tolerance (for a total depth of -49 feet MLLW) to accommodate larger ships (the existing design depth is -45 feet MLLW);
- Disposal of approximately 38,000 cubic yards of dredged materials (30,000 cubic yards from Berths 226-229 and 8,000 cubic yards from Berths 230-232) at an ocean disposal site (i.e., LA-2), an approved upland disposal facility, or a combination of the above;
- Addition of five new 100-foot gauge A-frame over-water gantry (wharf) cranes manufactured by Shanghai Zhenhua Heavy Industry Co., Ltd. (ZPMC), or equivalent. These additional cranes would be installed upon existing crane rails at Berths 226-229 to accommodate larger ships at the proposed deeper berths. Addition of the new cranes would require infrastructure improvements (such as cable and electrical upgrades);
- The raising of up to five of the existing operational cranes in order to accommodate larger vessels;
- Addition of five AMP vaults (throughout wharf area adjacent to Berths 226 to 232) and associated infrastructure (e.g., electrical conduit and wires);
- Installation of three-foot spacers between the wharf and existing wharf fenders to provide better clearance between the berthed vessels and the new king and sheet piles;
- Development of approximately 1.5 acres of vacant land as new backlands;
- Development of approximately 22 acres as new backlands and modified inbound and outbound gates associated with the relocation of the main gate. The development of the 22 acres would require closure (vacation) of streets within this backlands expansion area (see next bullet) and demolition of existing structures (with the exception of the existing electrical substation);
- Closure of portions of Terminal Way, Barracuda Street, Tuna Street, and Ways Street within the Project site and rerouting of Terminal Way traffic to Cannery Street;
- Improvements to Cannery Street, including: street realignment, pavement improvements, street widening, striping, traffic lighting and signals, drainage, and sidewalk improvements;
- Infrastructure to support 23.5 acres (1.5 + 22 acres) of new backlands (such as lighting, paving, and drainage improvements);
- Amendment of the lease to add approximately 48.5 acres of terminal backlands comprised of approximately 25 acres of existing developed terminal backlands currently under space assignment, and the 23.5 acres (1.5 plus 22 acres) of new backland area, for a total terminal acreage of approximately 229 acres; and

- Extension of the facility lease by 10 years for continued operations from the current end date of 2028 to 2038.

1.4.1.2 Terminal Improvements

Dredging and Pilings

The proposed improvements to Berths 226-229 include: 1) dredging to increase the depth from -45 to -53 feet MLLW plus two feet of overdepth tolerance (for a total of -55 feet MLLW); and 2) the installation of approximately 1,400 linear feet of king piles and sheet piles to accommodate the dredging activities and deeper design depth. The maximum tip elevations of the king piles and sheet piles would be approximately 110 feet MLLW, or up to 55 feet below the mudline. Dredging would remove approximately 30,000 cubic yards of sediment from alongside Berths 226-229.

The proposed improvements at Berths 230-232 would include: 1) dredging to increase the depth from -45 to -47 feet MLLW plus two feet of overdepth tolerance (for a total of -49 feet MLLW); and 2) the installation of sheet piles to accommodate the dredging activities and increased design depth. Dredging would remove approximately 8,000 cubic yards of sediment from alongside Berths 230-232. The sheet piles would be installed to approximately -85 feet MLLW (maximum sheet pile tip elevation of about 36 feet below the mudline) and over approximately 1,400 linear feet along these berths.

Dredging would occur 24 hours per day, for up to eight weeks. In total, approximately 38,000 cubic yards of sediment would be dredged and would require disposal. Disposal options include placement within an approved upland facility or approved ocean disposal site (i.e., LA-2). In addition, a combination of the above dredge material management options could be used.

Wharf and Crane Improvements

The proposed Project includes installation of three-foot spacers between the wharf and existing wharf fenders to provide better clearance between the berthed vessels and the new king and sheet piles. In addition, the proposed Project includes the raising of up to five of the existing cranes, as well as the installation of five new 100-foot gauge wharf cranes along the existing crane rail at Berths 226-229. The gauge represents the distance between a crane's rail supports. The new wharf cranes are expected to be similar in size and height as the five largest 100-gauge cranes currently at the Project site, which have an approximate height of 330 feet when stowed at a 45-degree angle (during crane maintenance activities the cranes can be placed in an 80-degree angle with a height of about 394 feet). The raised and new cranes would be able to offload cargo from ships loaded up to 22 containers wide. With the addition of the five new cranes under the proposed Project, there would be a total of 13 wharf cranes operating at the Everport Container Terminal. The new larger cranes are expected to be added to the northern end of the wharf, such that the largest cranes would be located along the portion of the wharf with the deepest berth, and the smaller cranes along the southern portions of the wharf.

Improvements associated with the installation of the new cranes include cable and other electrical infrastructure. Trenching/excavating associated with electrical infrastructure required to support the five new cranes would occur within the backlands and adjacent to the existing crane rails. To provide power and communication lines to the five new cranes, five new cable vaults (approximately 10 feet x 8 feet x 9 feet), one high voltage vault (approximately 10 feet x 10 feet x 12 feet), two new fiber optic vaults (approximately 5 feet x 5 feet x 6 feet), and approximately 1,400 feet of conduit (within

trenches ranging from 42 to 54 inches deep and 2 feet wide) would be installed. The proposed vaults and trenching would not include over-excavation.

In addition, two new high voltage vaults (approximately 10 feet x 10 feet x 12 feet), a new switchgear skid (approximately 30 feet x 20 feet x 3 feet), and approximately 1,850 feet of conduit in trenches ranging from 42 to 54 inches deep and 2 feet wide) would be installed in the terminal backlands in order to connect the new crane infrastructure to an existing power source on the terminal.

Further, five new AMP vaults and associated infrastructure (e.g., electrical conduit and wires) would be constructed at various locations within the wharf face of Berths 226 to 232 for a total of eight AMP vaults. The AMP vaults would be approximately 12 feet x 6 feet x 4 feet. The existing substation would be utilized for the new AMP vaults. Three additional pull boxes would be installed to connect the new AMP vaults with the existing substation. The trench depth for the electrical conduit/wires is 42 inches.

Backland Improvements

Backlands improvements would occur at two locations: the approximately 1.5-acre area adjacent to the PBF Energy (formerly ExxonMobil) liquid bulk terminal at Berths 238-240 and the approximately 22-acre area immediately south of the existing terminal boundary and north of Cannery Street (see Figure 1-4).

The 1.5-acre site is currently vacant and unpaved. The improvements would consist of placement of engineered fill, followed by the placement of base and pavement. Infrastructure, such as electrical lines, lighting, and drainage would also be installed. The new 1.5-acre backlands could be used for storing empty containers, chassis, wheeled containers, stacked containers or other purposes, depending on terminal needs.

The 22-acre site is comprised of vacant lots (paved and unpaved) as well as approximately 11 buildings/structures. Development of this 22-acre area would require demolition of all structures except the electrical substation, site cleanup, grading, followed by paving and development. Lands within the 22-acre area are currently under lease to commercial tenants by the LAHD under revocable permits, and permit revocation would not result in a requirement to relocate the tenants. Infrastructure, such as electrical lines, lighting, and drainage would also be installed. The existing electrical substation would remain operational within the redeveloped terminal, but would be fenced and segregated. Further, electrical infrastructure and connections to the substation may have to be relocated to avoid damage during development of the surrounding areas as backlands. The proposed layout of the Project includes the relocation of the main gate (inbound and outbound lanes) to the newly developed 22-acre area, and would include direct access onto the Project site from Earle Street at Terminal Way. Portions of the 22-acre area would also be used to improve the terminal circulation system, and to store chassis' and wheeled or stacked containers, or other terminal uses.

In addition, as part of ongoing and separate activities associated with the former Canner's Steam Company Plant site (a related project), contaminated soil and groundwater cleanup of that site would continue in accordance with the Los Angeles Regional Water Quality Control Board (LARWQCB) standards for the property. Ongoing remediation activities could include groundwater monitoring, extraction, and in-situ chemical oxidation. If required by the LARWQCB and/or LAHD and until the site case is officially closed, semi-annual groundwater monitoring and sampling would continue to document site conditions and to determine whether the site groundwater quality meets site cleanup requirements.

Street Closures

The expansion of the existing terminal to the 22-acre area south of the existing boundary would require the closure (vacation) of Terminal Way from Earle Street (on the east) to Seaside Avenue (on the west) and Tuna Street, Ways Street, and Barracuda Street from Terminal Way (on the north) to Cannery Street (on the south). Closure of these streets would require rerouting of traffic. Vehicles traveling on Terminal Way west of Earle Street would be rerouted to Cannery Street. Tuna Street, Ways Street, and Barracuda Street between Terminal Way and Cannery Street are limited north-south roadways that serve only the buildings or parcels that would be demolished or become part of the proposed Project. Vehicles traveling east from Seaside Avenue would travel east on Cannery Street, north on Earle Street, then east on Terminal Way. Drayage trucks going to/from the Project site would access the terminal from Earle Street (through the new gate), and through traffic going to and from Fish Harbor and the portions of Terminal Island along Seaside Avenue would utilize Cannery Street and Seaside Avenue after Terminal Way (between Seaside Avenue and Earle Street) is vacated. All the roadways that would be affected are designated "Local Roads," which would require street vacation approval from the City's Bureau of Engineering. The proposed Project would require utility relocations associated with the street closures. In addition, the proposed Project would include realignment of Cannery Street, as well as pavement improvements, widening, striping, traffic lighting and signals, drainage, and sidewalk improvements along Cannery Street.

1.4.1.3 Project Construction Phasing and Schedule

Construction of the proposed Project is expected to take approximately 24 months and the earliest it could begin would be in 2018. In-water construction would be staged such that one vessel could be at berth at any given time. Under this scenario, installation of sheet piles would occur along Berths 230-232, followed by dredging along these berths. Installation of spacers between the wharf and existing wharf fenders at Berths 230-232 would then occur. Operation of the terminal would continue during construction, with vessels utilizing Berths 226-229. Once work is completed at Berths 230 through 232, sheet and king piles would be installed along Berths 226-229, followed by dredging. Installation of spacers between the wharf and existing wharf fenders at Berths 226-229 would then occur. The AMP vaults (to be located at various locations along the wharf) would be constructed beginning the fifth month. Operation of the terminal would continue during construction, with vessels using Berths 230-232. The new cranes would be delivered and installed along the northern berths following in-water construction. The raising of up to five existing cranes would occur throughout the construction period. Backland construction at the 1.5-acre expansion area would occur concurrent with in-water construction. The following components would be subject to negotiations and an agreement between the Port and ETS: development of the approximately 22 acres as new backlands and relocation of the main gate, the closure of portions of Terminal Way, Barracuda Street, Tuna Street, and Ways Street within the Project site and rerouting of Terminal Way traffic to Cannery Street, as well as the demolition of the remaining buildings within the 22-acre area, including, but not limited to, buildings associated with the former StarKist Tuna Plant and the former Canner's Steam Company Plant. To be conservative, for the purposes of this Draft EIS/EIR's analysis, it is assumed that the agreement would be finalized such that the demolition and backland construction at the 22-acre expansion area would occur concurrent with the backland development at the 1.5-acre expansion area and in-water construction.

1.4.1.4 Proposed Project Operations

Lease Amendment

The existing 205-acre container terminal is operated by ETS. ETS (a wholly owned subsidiary of Evergreen Marine Corporation) is the permit holder under a lease agreement (Permit No. 888, as amended) between LAHD and ETS. As part of the proposed Project, the lease would be amended to include the addition of approximately 25 acres of existing terminal backlands currently under space assignment and the addition of approximately 23.5 acres (1.5 acres and 22 acres) proposed for backlands development under the proposed Project. The total terminal acreage for the proposed Project is approximately 229 acres. The existing lease began in 1997 and ends in 2028, and the lease amendment would extend the lease period by 10 years, for continued operations through 2038.

Terminal Operations

The Everport Container Terminal would continue container handling operations, as occurs under existing conditions. At this time, no foreseeable changes in the type of operations, such as terminal automation, are expected through 2038.

Anticipated Throughput

The proposed Project would improve the container-handling efficiency of the existing Everport Container Terminal at the Port to accommodate the projected fleet mix of larger container vessels (up to 16,000 TEUs) that are anticipated to call at the terminal through 2038. The proposed Project would increase the throughput capacity of the Everport Container Terminal from 1,818,000 TEUs to up to 2,379,525 TEUs annually. Under the proposed Project, maximum throughput is projected to occur by 2033 and remain at that level through 2038. Analysis of the impacts in this EIS/EIR assumes the maximum physical capacity to represent the worst-case scenario and ensure that all reasonably foreseeable and potentially significant adverse environmental impacts are identified and mitigated to the extent feasible. This EIS/EIR analyzes the proposed Project at the end of the new lease term at 2038 with the throughput ramping up in interim study years (2019, 2026, and 2033). The actual throughput levels for the proposed Project may be lower than the projected throughput at capacity as analyzed in this document due to market conditions.

Ship Operations

Currently, the terminal can service up to two larger vessels (up to 8,000 TEUs) concurrently at the two operating berths. After construction of the proposed Project, the terminal would be able to accommodate up to two larger vessels (one 16,000 TEU vessel and one 10,000 TEU vessel) concurrently. Although the proposed Project would not increase the number of vessels the terminal could manage concurrently, increasing the design depths along the wharf would allow the terminal to accommodate larger vessels with deeper drafts (up to 16,000 TEU vessels). The existing berth depths can accommodate vessels up to 8,000 TEUs, which constrains the existing terminal's capacity to approximately 1.82 million TEUs with 166 existing annual ship calls. The proposed Project would deepen the operating berths to accommodate larger vessels (up to 16,000 TEUs), which would remove the existing berth capacity constraint and allow the terminal to handle up to 2,379,525 TEUs annually. By 2038, at 2,379,525 TEUs, the terminal is anticipated to receive 208 annual ship calls, along with associated tugboats (2 tugs are required for each vessel move).

Rail Operations

In 2013, the Everport Container Terminal's throughput required an annual average of 1.6 trains per day, and an average of 1.8 trains per day during the peak month. The portion of the TICTF on-dock railyard that serves the Everport Container Terminal handled 230,227 TEUs (124,674 TEU imports and 105,553 TEU exports) in 2013. Under the proposed Project, the volume of cargo passing through the Everport Container Terminal's portion of the TICTF on-dock railyard is projected to increase from 230,227 TEUs in 2013 to 606,341 TEUs through 2038. The Everport Container Terminal's 2038 throughput is projected to result in an annual average of 5.0 trains per day, and an average of 5.6 trains per day during the peak month. The proposed Project would not make changes to the capacity of the Everport portion of TICTF, which would remain at 606,341 TEUs annually.

The existing TICTF on-dock railyards is projected to have slightly less capacity than the full amount of anticipated demand for on-dock rail facilities associated with the maximum terminal throughput of 2,379,525 TEUs. The volume of cargo passing through off-dock railyards is projected to increase from 53,791 TEUs in 2013 to 345,469 TEUs through 2038. The percentage of terminal throughput that would be handled by on-dock rail is expected to increase from approximately 18.6 percent in 2013 to approximately 25.5 percent by 2038, and off-dock railyards from approximately 4.3 percent in 2013 to approximately 14.5 percent by 2038. Loading, unloading, and hauling of rail cars would occur as it does under existing conditions.

In addition to transportation of cargo by on-dock rail, draying of containers to near- and off-dock facilities would continue to occur under the proposed Project, just as it occurs under existing conditions. Generally, trains are composed of containers that are all destined for one location. Where there is not a sufficient number of containers destined for the same location to make up a train, those containers are hauled to near- and off-dock facilities to be grouped with containers from other terminals bound for that same destination. Trucks would haul those containers on public highways to and from off-dock railyards, including the UP Carson ICTF, the BNSF Hobart Yard in Vernon, and the UP East Los Angeles Yard.

Truck Operations

In 2013, existing terminal operations resulted in 4,505 daily one-way truck trips (within the peak month) and 1,112,735 annual truck trips. Based on the anticipated mode splits for the proposed Project, the throughput capacity of 2,379,525 TEUs by 2038 would require a total of 7,028 average daily truck trips in the peak month, and 1,735,916 annual truck trips. Of the approximately 1,427,715 TEUs projected to be transported by trucks by 2038, approximately 345,469 TEUs (approximately 24 percent) would be intermodal cargo trucked to off-dock railyards.

Cargo-handling Equipment

The existing types of cargo handling yard equipment (such as RTG, side picks, top handlers, yard tractors and forklifts) are not expected to change as part of the proposed Project. As throughput increases, equipment would be added.

Terminal Operating Hours

The terminal operating hours are not expected to change from existing conditions (24-hour operations). Existing container handling activities largely occur across two shifts, but occasionally across three shifts during periods of high demand. Under the proposed

Project, container-handling activities would occur across three shifts to accommodate the higher throughput levels. The number of employees working at the terminal is expected to increase from an average daily total of 145 in 2013 to approximately 999 by 2038. The terminal is run as a continuous operation, in which more employees are hired to supplement operations as needed.

1.5 Port of Los Angeles Plans and Programs

LAHD has implemented a variety of plans and programs to reduce the environmental effects associated with operations at the Port. These programs include, but are not limited to the following: the San Pedro Bay Ports Clean Air Action Plan (CAAP), Water Resources Action Plan (WRAP), and Sustainable Construction Guidelines. All of these efforts ultimately reduce adverse environmental effects. Furthermore, LAHD is aggressively studying zero-emission technology with the intent of integrating zero emission equipment into terminal operations

1.5.1 Clean Air Action Plan (CAAP)

The Ports of Los Angeles and Long Beach, with the participation and cooperation of the staff of the USEPA, CARB, and SCAQMD, prepared the San Pedro Bay Ports CAAP, a planning and policy document that sets goals and implementation strategies to reduce air emissions and health risks associated with Port operations while allowing Port development to continue. In addition, the CAAP sought the reduction of criteria pollutant emissions to the levels that assure Port-related sources decrease their "fair share" of regional emissions to enable the South Coast Air Basin to attain state and federal ambient air quality standards. Each individual CAAP measure is a proposed strategy for achieving these emissions reductions goals. The Ports approved the first CAAP in November 2006.

The CAAP focuses primarily on reducing diesel particulate matter (DPM), along with nitrogen oxides (NO_X) and sulfur oxides (SO_X). This strategy reduces emissions and health risk and thereby allows for future Port growth while progressively controlling the impacts associated with such growth. The CAAP includes emission control measures as proposed strategies that are designed to further these goals expressed as Source-Specific Performance Standards which may be implemented through the environmental review process, or could be included in new leases or Port-wide tariffs, Memoranda of Understanding (MOU), voluntary action, grants, or incentive programs.

The CAAP Update, adopted in November 2010, includes updated and new emission control measures as proposed strategies that support the goals expressed as the Source-Specific Performance Standards and the Project-Specific Standards. In addition, the CAAP Update includes the recently developed San Pedro Bay Standards, which establish emission and health risk reduction goals to assist the Ports in their planning for adopting and implementing strategies to significantly reduce the effects of cumulative Port-related operations.

The goals set forth as the San Pedro Bay Standards are the most significant addition to the CAAP and include both a Bay-wide health risk reduction standard and a Bay-wide mass emission reduction standard. Ongoing Port-wide CAAP progress and effectiveness will be measured against these Bay-wide Standards, which consist of the following reductions as compared to 2005 emissions levels:

- Health Risk Reduction Standard: 85 percent reduction in DPM by 2020
- Emission Reduction Standards:
  - By 2014, reduce emissions by 72 percent for DPM, 22 percent for NO_X, and 93 percent for SO_X
  - By 2023, reduce emissions by 77 percent for DPM, 59 percent for NO_X, and 92 percent for SO_X

The Project-Specific Standard remains as adopted in the original CAAP in 2006, that new projects don't exceed a 10 in 1,000,000 excess residential cancer risk threshold, as determined by health risk assessments conducted subject to CEQA statutes, regulations, and guidelines, and implemented through required CEQA mitigations and/or lease negotiations. Although each Port has adopted the Project-Specific Standard as a policy, the Board of Harbor Commissioners retain the discretion to consider and approve projects that exceed this threshold if the Board deems it necessary by adoption of a statement of overriding considerations at the time of project approval.

This EIS/EIR analysis assumes compliance with the 2010 CAAP Update. Proposed Project-specific mitigation measures applied to reduce air emissions and public health impacts are consistent with, and in some cases exceed, the emission-reduction strategies of the CAAP.

In 2016, the Ports began the process of updating the CAAP to produce the third version. The scope and framework of this CAAP 3.0 Update continues to look at the five major mobile sources of air pollution in and around the ports, while placing new Bay-wide Standards for the future. In addition, the CAAP will be expanded to address the following:

- zero-emissions technologies
- greenhouse gas emissions reductions
- energy strategies
- supply chain optimization

Zero Emission Equipment

While the CAAP has been very successful at encouraging substantial emission reductions, further reductions are needed as port throughput continues to increase in the coming years. Furthermore, important greenhouse gas reduction deadlines approaching in the next few years, the LAHD has identified zero emission equipment as a critical element to be integrated into marine related goods movement in the future.

In 2011, the LAHD and the Port of Long Beach released a Zero Emission Technologies Roadmap to establish an initial plan for identifying technologies to pursue demonstrations to advance zero emission technology development. In July 2015, the LAHD released a draft Zero Emission white paper. The LAHD has provided over $7 million in funding for projects aimed at developing zero emission technology for short-haul drayage trucks and on-terminal yard tractors. Initial zero emission vehicle testing has shown mixed results, but more recent progress has been made that reinforces the LAHD's belief that zero emission container movement technologies show great promise for helping to reduce criteria pollutant and greenhouse gas emissions in the future.

The LAHD, working collaboratively with the Port of Long Beach and several stakeholders and partnerships, is committed to expanded development and testing of zero emission technologies, identification of new strategic funding opportunities to support these expanded activities, and new planning for long-term infrastructure development to sustain developed programs, all while ensuring competitiveness among the maritime goods movement businesses.

1.5.2 Water Resources Action Plan (WRAP)

Both LAHD and the Port of Long Beach face ongoing challenges from contaminants that remain in Port sediments, flow into the harbor from Port land, and flow from upstream sources in the watershed, well beyond the Ports' boundaries. Therefore, the Ports undertook a collaborative, scientific effort to address existing and potential sources of water and sediment pollution. Building on the collaborative model developed by the CAAP, under the WRAP the Ports will continue to work together and with other stakeholders to achieve further progress in water and sediment quality improvement. The WRAP establishes a program of water quality improvement measures necessary to achieve the goals and targets that will be established by the LARWQCB in upcoming regulations. The WRAP targets the four basic types of potential sources of pollutants to harbor waters (land use discharges, on-water discharges, sediments, and watershed discharges) and includes control measures zeroing in on known and potential sources of water and sediment contamination in the harbor area.

1.5.3 Port of Los Angeles Sustainable Construction Guidelines

LAHD adopted the Port of Los Angeles Sustainable Construction Guidelines in February 2008. The guidelines are used to establish air emission criteria for inclusion in bid specifications for construction. The guidelines reinforce and require sustainability measures during performance of the contracts, balancing the need to protect the environment, be socially responsible, and provide for the economic development of the Port. Future resolutions are anticipated to expand the guidelines to cover other aspects of construction, as well as planning and design. These guidelines support the Port Sustainability Program. The intent of the guidelines is to facilitate the integration of sustainable concepts and practices into all capital projects at the Port and to phase in the implementation of these procedures in a practical, yet aggressive, manner. These guidelines are made a part of all construction specifications advertised for bids.

1.5.4 Other Environmental Programs

Air Quality

Alternative Maritime Power. AMP reduces emissions from container vessels docked at the Port. Normally, ships shut off their propulsion engines when at berth, but use auxiliary diesel generators to power electrical needs such as lights, pumps, and refrigerator units. These generators emit an array of pollutants, primarily NO_X, SO_X, and particulate matter (PM_{10} and $PM_{2.5}$). The Port is in the process of providing shore-based electricity as an alternative to running the generators (a process also referred to as cold ironing). The AMP program allows ships to "plug-in" to shoreside electrical power while at dock instead of using on-board generators, a practice that will dramatically reduce emissions. Before being used at the Port, AMP was used commercially only by the

cruise ship industry in Juneau, Alaska. Now, Port AMP facilities have been installed and are currently in use at China Shipping Terminal, Yusen Terminal, Everport Container Terminal (the Project site), TraPac Terminal, and the Cruise Ship Terminal among others. AMP has been incorporated into the CAAP as a project-specific measure.

Off-Peak Program. Extending cargo terminal operations by five night and weekend work shifts, the Off-Peak Program, managed by PierPASS (an organization created by marine terminal operators) has been successful in increasing cargo movement, reducing the waiting time for trucks inside Port terminals, and reducing truck traffic during peak daytime commuting periods.

On-Dock Rail and the Alameda Corridor. Use of rail for long-haul cargo is acknowledged as an air quality benefit. Four existing on-dock railyards at the Port, including the existing on-dock facility on the Project site, significantly reduce the number of short-distance truck trips (the trips that normally would convey containers to and from off-site railyards). Combined, these intermodal facilities eliminate an estimated 1,400,000 truck trips per year and the emissions and traffic congestion that go along with them. A partner in the Alameda Corridor project, the Port is using the corridor to transport cargo to downtown railyards at 10 to 15 miles per hour faster. Use of the Alameda Corridor allows cargo to travel the 20 miles to downtown Los Angeles at a faster pace and promotes the use of rail versus truck. In addition, the Alameda Corridor eliminates 200 rail/street crossings and emissions produced by cars with engines idling while the trains pass. In 2004, the Port of Los Angeles Board of Harbor Commissioners adopted an Intermodal Rail Policy to guide the development of additional rail facilities, to reduce the number and length of truck trips in the Port area, and to achieve reductions in rail-related air emissions. The Port Resolution:

- Provides for on-dock and comparable near-dock intermodal facilities for shippers, carriers, terminal operators, and Class I railroads;
- Ensures all Port customers are utilizing on-dock intermodal rail to the fullest extent feasibly possible;
- Ensures sufficient rail capacity is maintained to increase rail usage, meet future demand, and adapt to evolving intermodal rail operations;
- Provides the opportunity to direct local movements of cargo from truck to rail;
- Encourages Port customers to pool container cargo and share on-dock and-near dock rail facilities to the fullest extent feasible.

Tugboat Retrofit Project. The engines of several tugboats in the Port were replaced with ultra-low-emission diesel engines. This was the first time such technology had been applied to such a large engine. Emissions testing showed a reduction of more than 80 tons of NO_X per year, nearly three times better than initial estimates. Under the Carl Moyer Program,[1] the majority of tugboats operating in the Port Complex have been retrofitted.

[1] The Carl Moyer Program is a grant program implemented by CARB and administered by SCAQMD to fund the incremental cost of cleaner-than-required engines.

Electric and Alternative Fuel Vehicles. LAHD has converted more than 35 percent of its fleet to electric or alternative-fuel vehicles. These include heavy-duty vehicles and passenger vehicles. LAHD proactively has embarked on the use of emulsified fuels that are verified by CARB to reduce diesel particulates by more than 60 percent compared to diesel-powered equipment.

Electrified Terminal Operating Equipment. The approximately 86 ship-loading cranes currently in use at the Port operate under electric power. In addition, numerous other terminal operations equipment has been fitted with electric motors.

Yard Equipment Retrofit Program. Over the past five years, diesel oxidation catalysts have been applied to nearly all yard tractors at the Port. This program has been carried out with Port funds and funding from the Carl Moyer Program.

Vessel Speed Reduction Program. Under this voluntary program, oceangoing vessels slow to 12 knots when within 20 and 40 nautical miles of the entrance to Los Angeles Harbor, thus reducing emissions from main propulsion engines. As of 2014, approximately 100 percent of ships comply with the voluntary program within 20 nautical miles and 95 percent comply within 40 nautical miles.

Everport Enhanced Cargo Demonstration Project(s)

ETS (through LAHD) was awarded a grant from the California Energy Commission (CEC) in late 2016 to commission a demonstration project for five zero-emission yard tractors, and 20 near-zero-yard tractors equipped with the California Air Resources Board certified Cummins Westport Low NOx engines (0.02 grams of nitrogen oxides/brake horsepower-hour) at the Everport Container Terminal. To further reduce greenhouse gases the near-zero-emission yard tractors will be fueled with renewable liquefied natural gas provided by Clean Energy via a mobile liquefied natural gas fueling system. This demonstration project is expected to begin in mid-2018 and last for 12 months.

In addition, the LAHD was awarded a second CEC grant in early 2017 to commission a demonstration project for two zero-emission battery electric top handlers and three additional zero-emission battery electric yard tractors to undergo a demonstration project at the Everport Container Terminal as well. This demonstration project will be followed and included into Lease Measure (LM) AQ-1 regarding the periodic review of new technology (refer to Section 3.2.4.7 in Section 3.2, Air Quality and Meteorology, for a description of LM AQ-1). This demonstration project is expected to begin in Summer 2019 and last for 12 months.

The project will take the next step toward demonstration of an entire zero emissions pathway throughout the marine container terminal for cargo handling equipment, starting with the electric ship-to-shore cranes unloading cargo to zero-emission yard tractors to zero-emission top handlers to receive cargo to the yard trucks and either stack containers or load drayage trucks/trains for departure to the terminal.

The demonstration project will also integrate an Electric Truck Smart Plug-In System which will automatically connect and automatically disconnect from zero-emission yard tractors. This system, first of its kind, if successful, will be the standard for connecting zero-emission yard tractors to grid power, which is expected to be safer and more efficient way to connect zero-emission equipment to electrical power for vehicle charging. The zero-emission top handlers will be charged with standard infrastructure.

The design for a Smart Plug-In System for zero-emission top handlers has not been engineered for this project.

Water Quality

Water Quality Monitoring. LAHD has been monitoring water quality at 31 established stations in San Pedro Bay since 1967, and the water quality today at the Port is among the best of any industrialized port in the world. Samples are tested on a monthly basis for dissolved oxygen, biological oxygen demand, and temperature. Other observations are noted, such as odor and color, as well as the presence of oil, grease, and floating solids. The overall results of this long-term monitoring initiative show the tremendous improvement in harbor water quality that has occurred over the last four decades.

Inner Cabrillo Beach Water Quality Improvements. The Port is one of the few industrial ports in the world to have a swimming beach. Inner Cabrillo Beach provides quiet water for families with small children. However, in recent years, upland runoff has resulted in high levels of bacteria in shoreline waters. LAHD has invested hundreds of thousands of dollars in water circulation/quality models and studies to investigate the problem. Recently, LAHD repaired storm drains and sewer lines, replaced poor quality beach sand with clean sand, removed the groin at the north end of the beach, and installed a bird exclusion device, all as part of its commitment to make sure that Inner Cabrillo Beach continues to be an important regional recreational asset, but more importantly—improve water quality. In 2004, the LARWQCB adopted an Amendment to the Water Quality Control Plan to incorporate the Los Angeles Harbor Bacteria Total Maximum Daily Load (TMDL). The TMDL was developed to address impairments of water quality standards by coliform and beach closures at Inner Cabrillo Beach and the Main Ship Channel at the Port. A TMDL specifies the maximum amount of a pollutant that a water body can receive and still meet water quality standards, and allocates the pollutant loadings to point and nonpoint sources.

Habitat Management and Endangered Species

California Least Tern Site Management. The federal- and state-endangered California least tern (a species of small sea bird) nests from April through August on Pier 400 in the Port adjacent to the Pier 400 container terminal. Through an interagency nesting site agreement, LAHD maintains, monitors, and protects the approximately 15-acre nesting site on Pier 400.

Interagency Biomitigation Team. As part of the development of mitigation for the Deep-Draft Navigation Improvements, including the Pier 400 Landfill, the Port Complex helped establish an interagency mitigation team to evaluate and provide solutions for impacts of landfill and terminal construction on marine resources in the Ports. The primary agencies involved include USACE, U.S. Fish and Wildlife Service, National Marine Fisheries Service, and California Department of Fish and Wildlife. A number of mitigation agreements have been established through this coordination, and the team continues to meet as necessary to address environmental issues associated with Port development and operations.

General Port Environmental Programs

Green Building Policy. In August 2007, LAHD adopted a Green Building Policy, which outlines the environmental goals for newly constructed and existing buildings, dictates

the incorporation of solar power and technologies that are efficient with respect to the use of energy and water, dedicates staffing for the advancement and refinement of sustainable building practices, and maintains communication with other City of Los Angeles departments for the benefit of the community. The policy incorporates sustainable building design and construction guidelines based on the U.S. Green Building Council – Leadership in Energy and Environmental Design Green Building Rating System.

Recycling. LAHD incorporates a variety of innovative environmental ideas into its construction projects. For example, when building an on-dock rail facility, LAHD saved nearly $1,000,000 and thousands of cubic yards of landfill space by recycling existing asphalt pavement instead of purchasing new pavement. LAHD also maintains an annual contract to crush and recycle broken concrete and asphalt. In addition, LAHD successfully has used recycled plastic products, such as fender piles and protective front-row piles, in many wharf construction projects.

1.6 Changes to the Draft EIS/EIR

Actual changes to the text, organized by Draft EIS/EIR chapters and sections, can be found in Chapter 3, "Modifications to the Draft EIS/EIR," of this Final EIS/EIR. The changes to the Draft EIS/EIR have been made for the purpose of correcting and clarifying information contained within the Draft EIS/EIR based on comments received from the public. Changes noted in Chapter 3 are identified by text strikeout and underline. These changes are referenced in Chapter 2, "Responses to Draft EIS/EIR Comments," of this Final EIS/EIR, where applicable. The project description is presented above and summarized in the Executive Summary, incorporating the editorial changes noted in the Responses to Comments and other minor corrections.

The changes and clarifications presented in Chapter 3 of the Final EIS/EIR were reviewed to determine whether or not they warranted recirculation of the Draft EIS/EIR prior to certification of the EIS/EIR according to CEQA and NEPA Guidelines and Statutes. The changes would not result in any new significant environmental impacts or a substantial increase in the severity of an existing environmental effect. In response to public comments, changes and clarifications have been made throughout the Draft EIS/EIR. The changes are consistent with the findings contained in the environmental impact categories in Chapter 3, "Environmental Analysis," of the Draft EIS/EIR, as amended. There would be no new or increased significant effects on the environment due to the proposed project changes, and no new alternatives have been identified that would reduce significant effects of the proposed Project. Therefore, the Draft EIS/EIR does not need to be recirculated, and the EIS/EIR can be certified without additional public review, consistent with PRC Section 21092.1 and CEQA Guidelines Section 15088.5, and NEPA regulations in 40 Code of Federal Regulations 1502 and 1503.

1.7 References

Port of Los Angeles (POLA). 2015. Tonnage Statistics. Available: http://www.portofla.org/maritime/tonnage.asp. Accessed January 2015.

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Chapter 2
Response to Comments

2.1 Distribution of the Draft EIS/EIR

The Draft EIS/EIR prepared for the LAHD and USACE was distributed to the public and regulatory agencies on August 20, 2017, for a 45-day review period. Approximately 162 printed and digital copies (CD) of the Draft EIS/EIR were distributed to various government agencies, organizations, individuals, and Port tenants. The USACE also published a Notice of Availability (NOA) of the Draft EIS/EIR in the Federal Register (Volume 82, No. 76 page 18759) and published a Public Notice, both on April 21, 2017. LAHD, in cooperation with the USACE, conducted a public hearing regarding the Draft EIS/EIR on May 10, 2017, to provide an overview of the proposed Project and alternatives and to accept public comments on the proposed Project, alternatives, and environmental document.

Printed and digital copies of the Draft EIS/EIR were available for review at the following locations:

- Los Angeles Harbor Department, Environmental Management Division, 222 West 6th Street, Suite 900, San Pedro, CA 90731
- Los Angeles Public Library - Central Branch, 630 West 5th Street, Los Angeles, CA 90071
- Los Angeles Public Library - San Pedro Branch, 931 South Gaffey Street, San Pedro, CA 90731
- Los Angeles Public Library - Wilmington Branch, 1300 North Avalon, Wilmington, CA 90744

In addition to printed copies of the Draft EIS/EIR, digital copies were made available in response to specific requests. Due to the size of the document, the digital copies were prepared as a series of PDF files to facilitate downloading and printing. Members of the public were also invited to request a CD containing the EIS/EIR. Digital copies of the Draft EIS/EIR on CD were available free of charge to interested parties. The Draft EIS/EIR was available in its entirety on the Port web site at http://www.portoflosangeles.org/environmental/publicnotice.htm, with the public notice available online at www.spl.usace.army.mil/regulatory/POLA.htm. The USACE NOA and Public Notice were also made available online at www.federalregister.gov, and www.spl.usace.army.mil/Missions/CivilWorks/Regulatory, respectively.

2.2 Comments on the Draft EIS/EIR

The public comment and response component of the NEPA/CEQA process serves an essential role. It allows the respective lead agencies to assess the impacts of a project based on the analysis of other responsible, concerned, or adjacent agencies and interested parties, and it provides an opportunity to amplify and better explain the analyses that the lead agencies have undertaken to determine the potential environmental impacts of a project. To that extent, responses to comments are intended to provide complete and thorough explanations to commenting agencies and individuals, and to improve the overall understanding of the Project for the decision-making bodies.

The USACE and LAHD received 21 comment letters on the Draft EIS/EIR during the public review period. Four verbal comments were received at the public hearing. Table 2-1 presents a list of those agencies, organizations, and individuals who commented on the Draft EIS/EIR.

Table 2-1: Public Comments Received on the Draft EIS/EIR

Letter Code	Date	Individual/Organization	Page
Federal Government			
NMFS	05/31/17	Bryant Chesney, U.S. Dept. of Commerce, National Oceanic and Atmospheric Admin., National Marine Fisheries Service	2-24 to 2-25
USDOI	06/04/17	Janet L. Whitlock, Regional Environmental Officer, U.S. Dept. of the Interior	2-26 to 2-27
USEPA	06/05/17	Kathleen Martyn Goforth, Mgr., Environmental Review Section, U.S. Environmental Protection Agency, Region IX	2-28 to 2-45
USFWS	06/05/17	Jonathan Snyder for Karen A. Goebel, Asst. Field Supervisor, U.S. Dept. of the Interior, Fish and Wildlife Service, Ecological Services	2-46 to 2-49
State Government			
DTSC	05/19/17	Department of Toxic Substances Control	2-50 to 2-57
DOT	05/24/17	DiAnna Watson, IGR/CEQA Branch Chief, California Dept. of Transportation, District 7 – Office of Regional Planning	2-58 to 2-59
CARB	06/05/17	Elizabeth Yura, Chief, Emissions Assessment Branch, Transportation and Toxics Division, California Air Resources Board	2-60 to 2-80
Regional and Local Government			
BOS	05/01/17	Ali Poosti, Division Mgr., City of Los Angeles, Bureau of Sanitation,	2-81 to 2-83

Letter Code	Date	Individual/Organization	Page
		Wastewater Engineering Services Division	
SCAQMD	06/02/17	Jillian Wong, Ph.D., Planning and Rules Mgr., Planning, Rule Development & Area Sources, South Coast Air Quality Management District	2-84 to 2-103
Organizations			
JTR	04/20/17	John Tommy Rosas, Tribal Administrator, Tongva Ancestral Territorial Tribal Nation	2-104 to 2-105
CCSC	06/05/17	Dr. Tom Williams, Sr. Technical Advisor, Citizens Coalition for a Safe Community	2-106 to 2-110
CFSE	06/05/17	Coalition for a Safe Environment	2-111 to 2-133
EJ	06/05/17	Adrian Martinez, Staff Attorney, Earthjustice	2-134 to 2-136
LAC	06/05/17	Gary Toebben, President & CEO, Los Angeles Area Chamber of Commerce	2-137 to 2-138
NRDC	06/05/17	Melissa Lin Perrella, Natural Resources Defense Council	2-139 to 2-146
PMSA	06/05/17	Thomas Jelenić, Vice President, Pacific Merchant Shipping Association	2-147 to 2-148
Individuals/Companies			
MK	05/03/17	Michelle Kosik	2-149 to 2-150
IB	05/07/17	ibeahimaadji1	2-151 to 2-152
HP	05/15/17	Stephane de Bord, Hellman Properties	2-153 to 2-154
VICA	06/01/17	Kevin Tamaki, Chair, and Stuart Waldman, President, Valley Industry and Commerce Association	2-155 to 2-156
MCC	06/05/17	George H. Atkinson, Vice President and So. CA Area Mgr., Manson Construction Company	2-157 to 2-159
Draft EIS/EIR Public Hearing – Transcript			
PH1	May 10, 2017	Melissa Lin Perrella, Natural Resources Defense Council	2-177 to 2-178 and 2-186
PH2	May 10, 2017	Jesse Marquez, Coalition for a Safe Environment	2-178 to 2-180 and 2-186 to 2-187
PH3	May 10, 2017	Kathleen Woodfield, San Pedro Peninsula Homeowners Coalition	2-181 to 2-182 and 2-187 to 2-188
PH4	May 10, 2017	David Therrien	2-182 to 2-184 and 2-188

2.3 Responses to Comments

In accordance with NEPA (23 CRR Part 771) and CEQA (Guidelines Section 15088), the USACE and LAHD have evaluated the comments on environmental issues received from agencies and other interested parties and have prepared written responses to each comment pertinent to the adequacy of the environmental analyses contained in the Draft EIS/EIR. In implementing regulations 23 CFR Part 771 of NEPA and specific compliance with CEQA Guidelines Section 15088(b), the written responses address the environmental issues raised. In addition, where appropriate, the basis for incorporating or not incorporating specific suggestions into the proposed Project is provided. In each case, the USACE and LAHD have expended a good faith effort, supported by reasoned analysis, to respond to comments.

This section includes responses not only to the written comments received during the 45-day public review period of the Draft EIS/EIR, but also verbal comments made at the public hearing for the Draft EIS/EIR. Some comments have prompted revisions to the text of the Draft EIS/EIR, which are referenced and shown in Chapter 3, "Modifications to the Draft EIS/EIR." A copy of each comment letter/comment is provided, and responses to each comment letter immediately follow. All of the comments received and the responses to those comments will be considered by the decision-makers prior to taking any action on the proposed Project.

Several comments on the Draft EIS/EIR claimed that the document should be revised and recirculated for additional public review and comment. The following response discusses the standards generally applicable to this issue, particularly under CEQA, and applies those standards to the comments requesting recirculation.

A lead agency is required to recirculate a Draft EIR when the agency adds "significant new information" to the EIR after the close of the public comment period but prior to certification of the Final EIR (Public Resources Code Section 21092.1; State CEQA Guidelines Section 15088.5.). "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement" (State CEQA Guidelines Section 15088.5(a)). "Significant" new information includes information showing that "(1) [a] new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented [;] or (2) [a] substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance" (State CEQA Guidelines Section 15088.5 (a)(1), (a)(2)).

The Resources Agency adopted Section 15088.5 of the State CEQA Guidelines in order to incorporate the California Supreme Court's decision in Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal. (1993) 6 Cal.4th 1112. According to the Supreme Court, the rules governing recirculation of a Draft EIR are "not intend[ed] to promote endless rounds of revision and recirculation of EIRs" (Laurel Heights II, supra, 6 Cal.4th at p. 1132). Instead, recirculation is "an exception, rather than the general rule" (Mount Shasta Bioregional Ecology Center v. County of Siskiyou (2012) 210 Cal.App.4th 184, 221).

Under these standards, a change to a proposed project, made in response to comments on a Draft EIR, generally does not trigger the obligation to recirculate the Draft EIR. "The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold

of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal" (County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 199; see River Valley Preservation Project v. Metropolitan Transit Development Bd. (1995) 37 Cal.App.4th 154, 168, fn. 11).

As these cases recognize, CEQA encourages the lead agency to respond to concerns as they arise, by adjusting a project or developing mitigation measures, as necessary. That a project evolves to address such concerns is evidence of an agency performing meaningful environmental review. A rule requiring recirculation of the Draft EIR any time a project changes would have the perverse unintended effect of calcifying or freezing the original proposal, and of penalizing the lead agency or the project sponsor for revising the project in ways that may be environmentally benign or even beneficial. In light of this policy concern, the courts uniformly hold that the lead agency need not recirculate the Draft EIR merely because the proposed project evolves during the environmental review process. (See, e.g., Citizens for a Sustainable Treasure Island v. City and County of San Francisco (2014) 227 Cal.App.4th 1036, 1061-1065 [project modification requiring consultation with Coast Guard regarding building designs did not require recirculation of Draft EIR]; South County Citizens for Smart Growth v. County of Nevada (2013) 221 Cal.App.4th 316, 329-332 [identification of staff-recommended alternative after publication of Final EIR did not trigger obligation to recirculate Draft EIR because alternative resembled other alternatives that the EIR had already analyzed]; Western Placer Citizens for an Agricultural and Rural Environment v. County of Placer (2006) 144 Cal.App.4th 890, 903-906 [revision in phasing plan did not trigger recirculation requirement because revision addressed environmental concerns identified during EIR process].)

Similarly, information that clarifies or expands on information in the Draft EIR/EIS does not require recirculation. (See, e.g., North Coast Rivers Alliance v. Marin Municipal Water Dist. Bd. of Directors (2013) 216 Cal.App.4th 614, 654-656 [addition of a hybrid alternative to the Final EIR did not trigger duty to recirculate the Draft EIR]; Clover Valley Foundation v. City of Rocklin (2011) 197 Cal.App.4th 200, 219-224 [information regarding presence of cultural resources on property did not require recirculation because information amplified on information that was already in Draft EIR]; California Oak Foundation v. Regents of Univ. of Cal. (2010) 188 Cal.App.4th 227, 266-268 [letters addressing seismic risks did not trigger duty to recirculate Draft EIR, where letters recommended further analysis but did not contradict conclusions in Draft EIR]; Cadiz Land Co. v. Rail Cycle, L.P. (2000) 83 Cal.App.4th 74, 97 [commenter's disagreement with analysis of groundwater flow in EIR did not require recirculation because substantial evidence supported EIR's analysis; lead agency had discretion regarding which expert to rely upon]; Marin Municipal Water Dist. v. KG Land California Corp (1991) 235 Cal.App.3d 1652, 1666-1668 [clarifying information regarding potential length of moratorium was not "significant new information"].)

The following discussion applies these standards to the comments stating that the LAHD should recirculate the Draft EIR. In particular, the discussion focuses on whether the information provided in the comment is new, and whether that information discloses:

- A new significant impact that the project or mitigation would cause,
- An impact that would be substantially more severe unless mitigation is adopted that avoids the impact,

- A feasible project alternative is available that would avoid a significant impact, but the applicant will not adopt it, or
- That the Draft EIR is "fundamentally and basically inadequate" such that meaningful public comment was precluded (CEQA Guidelines Section 15088.5(a)).

In the instance of the EIS/EIR, a number of comments were provided on the document. Comments were provided on nearly every impact addressed in the EIS/EIR. Further, comments were also provided on the alternatives.

The responses to comments are extensive, in large part because the comments were also extensive. The responses to comments provide the following information:

- First and foremost, the responses address the environmental concerns raised by the comments, and describe how they are addressed in the document;
- They provide corrections to the text, where such corrections are warranted;
- They expand on or provide minor clarifications to information already included in the Draft EIR in those instances where comments question this information;
- They result in proposals for new mitigation measures that may more effectively reduce already identified significant environmental impacts of the project; and
- They address recommendations for alternatives to the project, including whether these recommendations are already included in the alternatives evaluated in the EIS/EIR.

However, none of the conditions warranting recirculation of a Draft EIR, as specified in State CEQA Guidelines Section 15088.5 and described above, has occurred. As a result of responses to comments and the additional of new information, no new significant impacts would result; there is no increase in the severity of a significant impact identified in the Draft EIR, following mitigation; no feasible alternatives have been recommended that would avoid a significant impact, wherein the applicant has refused to adopt such an alternative; and as to the Draft EIR adequacy, the LAHD believes the EIR is complete and fully compliant with CEQA.

2.3.1 Master Responses

Because a large number of the comment letters received had similar concerns, a set of master responses were developed to address common topics in a comprehensive manner. The following Master Responses section includes feedback on the following topics:

1. Feasible Mitigation – Guidance and Applicability
2. Zero-Emission Technologies
3. Port-wide Emission Reduction Programs
4. Energy Usage and Appendix F

Individual responses to all comment letters/comments received on the Draft EIS/EIR are presented following the Master Responses and may refer to the Master Responses in total or in part.

2.3.1.1 Master Response 1: Feasible Mitigation – Guidance and Applicability

Several comments questioned whether all feasible mitigation measures have been identified within the Draft EIS/EIR to reduce impacts to the maximum extent feasible. This response provides the CEQA and NEPA requirements for consideration of mitigation measures.

Mitigation is required only for significant environmental impacts (PRC 21100(b)(3); State CEQA Guidelines Sections 15126.4(a)(1)(A) and 15064(e)). CEQA provides that environmental analysis should emphasize feasible mitigation measures (PRC 21003(c)). An agency may, however, reject mitigation measures or project alternatives if it finds them to be "infeasible" (PRC 21081(a)(3); State CEQA Guidelines Section 15091(a)(3)). "Feasible" is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (PRC 21061.1; State CEQA Guidelines Section 15364). Consideration of feasibility of mitigation measures may also be based on practicality (No Slo Transit, Inc. v. City of Long Beach [1987] 197 Cal.App.3d 241, 257). In addition, while a lead agency is required to respond to comments proposing concrete, obviously feasible mitigation measures, it is not required to accept suggested mitigation measures (A Local and Regional Monitor (ALARM) v. City of Los Angeles (1993) 12 Cal. App. 4th 1773, 1809). Although not entirely the same as CEQA, mitigation requirements exist under NEPA (40 CFR 1500-1508) and USACE program regulations (33 CFR 320-332).

In reviewing specific proposed suggestions for mitigation measures, LAHD has been cognizant of the legal obligation under CEQA to substantially lessen or avoid significant environmental effects to the extent feasible. LAHD recognizes, moreover, that comments frequently offer thoughtful suggestions regarding how a commenter believes that a particular proposed mitigation measure can be modified, or perhaps changed significantly, in order to more effectively, in the commenter's view, reduce the severity of environmental effects. LAHD is also cognizant, however, that, the mitigation measures presented in the Draft EIR represent the expert opinions of the preparers of the Draft EIS/EIR regarding how best to effectively, and feasibly, substantially reduce or avoid the proposed Project's significant environmental effects. Further, those mitigation measures have been subjected to public review and scrutiny through the Draft EIS/EIR process. In determining whether to accept such changes, either in whole or in part, LAHD has considered the following factors, among others: (i) whether the proposed revisions are feasible from an economic, technical, legal, environmental, or other standpoint; (ii) whether the mitigation measure(s) suggested to be revised relate to a significant and unavoidable environmental effect of the proposed Project, or instead relate to an effect that can already be mitigated to less-than-significant levels by the mitigation measures proposed in the Draft EIS/EIR; (iii) whether the proposed revisions represent a clear improvement, from an environmental standpoint, over the draft language that a commenter seeks to replace; and (iv) whether the proposed revisions are sufficiently clear as to be easily understood by those who will implement them.

In coordination with the LAHD's identification of mitigation measures for impacts identified under CEQA, the USACE has also identified mitigation measures for impacts identified under federal law. The NEPA (40 CFR 1500–1508) and USACE regulatory program regulations (33 CFR 320–332) provide authority for USACE to require mitigation for impacts on waters of the United States (U.S.) (40 CFR 1508.14 and 1508.20; 33 CFR 320.4, 33 CFR 325.4, 33 CFR 325 Appendix B paragraph 9(5)(e), and 33 CFR 332).

USACE also implements the USEPA Section 404(b)(1) Guidelines (40 CFR 230), which provide authority for USACE to require mitigation for impacts on waters of the U.S., including special aquatic sites, when the impact results from a discharge of dredged or fill material. To determine mitigation requirements during the DA permit evaluation process, USACE applies established regulations and/or the 404(b)(1) Guidelines (if applicable), including the avoidance/minimization/compensation sequencing described in the USACE-USEPA Memorandum of Understanding (1990) and the South Pacific Division procedures for determining compensatory mitigation ratios. Under Section 10 of the Rivers and Harbors Act (33 U.S.C. 403), which authorizes work and structures in, over, and under any navigable water of the U.S., the required public interest review at 33 CFR 320.4 provides authority for USACE to require mitigation for impacts on navigable waters of the U.S.

While the Berths 226–236 [Everport] Container Terminal Improvements Project (proposed Project) would not result in a discharge of dredged or fill material into waters of the U.S. and therefore, the 404(b)(1) Guidelines would not be applicable to this permit application, mitigation requirements for the proposed Project have been developed as part of the NEPA (EIS) process and USACE permit evaluation process to address potential impacts related to the proposed work and structures in, over, and under navigable waters of the U.S., which are regulated under Section 10 of the Rivers and Harbors Act. More specifically, mitigation requirements associated with USACE's federal action on the proposed Project (i.e., potential issuance of a permit) are primarily guided by the required public interest review (33 CFR 320.4(a) and (r)). Pending USEPA approval under Section 103 of the Marine Protection, Research and Sanctuaries Act (33 U.S.C. 1413), the USACE may also authorize the transport of suitable dredged material for disposal at the LA-2 offshore dredged material disposal site. Pursuant to USACE implementing regulations (33 CFR 325.4), the Los Angeles District Regulatory Division has developed standard special conditions that are specific to transport of dredged material for the purpose of ocean disposal; such conditions are designed to avoid and minimize impacts on ocean resources and are always included on DA permits when ocean disposal of dredged material is approved. Such conditions include, but are not limited to, measures to reduce air quality impacts associated with the transport of the dredged materials, specifically, MM AQ-1 – Harbor Craft Used During Construction, MM AQ-3 – Non-Road Construction Equipment, and MM AQ-5 – General Construction Mitigation Measure. In the event that disposal of dredged material occurs in upland areas, instead of ocean disposal, the reduction of air quality impacts would occur through the USACE requirement of measures such as MM AQ-1 – Harbor Craft Used During Construction, MM AQ-2 – On-road Trucks Used During Construction, MM AQ-3 – Non-Road Construction Equipment, and MM AQ-5 – General Construction Mitigation Measure.

As is often evident from the specific responses given to specific suggestions, the LAHD and USACE staff and consultants spent large amounts of time carefully considering proposed suggestions for new and revised mitigation measures and in some instances adopted some or all of what a commenter suggested. In no instance did the LAHD and USACE fail to take seriously a suggestion made by a commenter or fail to appreciate the effort that went into the formulation of suggestions.

LAHD and USACE have identified and propose to incorporate all feasible mitigation measures, including feasible mitigation measures and feasible revisions to the existing mitigation measures recommended by commenters. No additional mitigation measures have been determined to be feasible to reduce significant impacts disclosed in the EIS/EIR; however, MM AQ-5 has been modified to require that, subject to availability, all dredging

equipment be electric powered (please refer to Chapter 3 of this Final EIS/EIR). Many of the comments on mitigation feasibility focused on zero-emission technologies. This topic and its feasibility are discussed in detail in Master Response 2: Zero-Emissions Technologies, below. The feasibility of other specific suggested measures is discussed in the individual responses below, as appropriate.

2.3.1.2 Master Response 2: Zero-Emission Technologies

A commenter requested the Final EIS/EIR to include specific mitigation measures for how the proposed Project will achieve the goals and objectives of the San Pedro Bay Ports 2017 Clean Air Action Plan Discussion Draft. Other commenters mentioned that the Draft EIS/EIR did not include discussion of, or meaningful commitment to, zero-emissions technologies. This master response addresses those comments by explaining how the LAHD has invested in or secured funding to advance zero- and near-zero technologies in the goods movement industry, including a late-2016 grant from the California Energy Commission (CEC) to demonstrate the extended use of zero- and near-zero yard tractors and top picks at the Evergreen Container Terminal.

Background

While the CAAP has been very successful at encouraging substantial emission reductions, further reductions are needed Port-wide as growth continues to increase in the coming years. Furthermore, the LAHD has identified zero-emission equipment as a critical element to be integrated into marine related goods movement in order to meet greenhouse gas (GHG) reduction deadlines. The Technology Status Report – Zero Emission Drayage Trucks (TIAX, 2011), prepared for the Ports of Los Angeles and Long Beach, examined the state of current zero-emission technologies and outlined a reasonable, programmatic approach to commercialization, based on thorough demonstration and evaluation. The report concludes that a two-phase demonstration approach to commercialization is needed. The first phase would be a small-scale (one to three units) demonstration to test basic technical performance. This would be followed by the second phase consisting of a broader, large-scale (ten to twenty units) demonstration to assess how the technologies fit into existing operations on a multi-unit basis.

In July 2011, at a joint meeting with the Harbor Commissions of the Ports of Los Angeles and Long Beach (also called the San Pedro Bay Port Complex), staff presented the Roadmap for Zero Emissions (Port of Los Angeles and Port of Long Beach, 2011). This document, prepared by the two Ports, expresses the Ports' commitment to zero-emission technologies by establishing a reasonable framework for future identification, development, and testing of non-polluting technologies for moving cargo. The Ports of Los Angeles and Long Beach's joint San Pedro Bay Ports Technology Advancement Program (TAP) funds efforts to evaluate and demonstrate new technologies such as zero-emission trucks that could further reduce emissions from goods movement. The Port of Los Angeles and Long Beach regularly meet with technology developers to stay informed about new and emerging technologies that may provide options for reducing emissions from Port operations. Furthermore, annual status reports on the TAP's completed and ongoing projects are provided on the TAP website at http://www.cleanairactionplan.org/technology-advancement-program/. Recommendations from the TAP are taken to the Boards of Harbor Commissioners when selecting and funding projects.

As detailed in Section 1.6.8.1 of Chapter 1, Introduction of the Draft EIS/EIR, Zero Emission Equipment, in July 2015, the LAHD released a draft Zero Emission White Paper

to assist the Port in moving toward the adoption of zero-emission technologies utilized for the purpose of moving cargo on and off Port terminals to a final destination. The LAHD has provided over $7 million in funding for projects aimed at developing zero-emission technology for short-haul drayage trucks and on-terminal yard tractors. Initial zero-emission vehicle testing has shown mixed results, but more recent progress has been made that reinforces the LAHD's belief that zero-emission container movement technologies show great promise for helping to reduce criteria pollutant and GHG emissions in the future. While zero-emission technologies are promising, zero emission trucks and most zero-emission container movement systems (ZECMS) require longer-term evaluations to establish the technical viability, operational reliability and the ability to attract participation from established original equipment manufacturers that will lower acquisition and maintenance costs and allow this equipment to become commercially viable. ZECMS also present many operational concerns, such as charging/fueling and maintenance that need to be examined prior to full deployment into the fleet. Additionally, durability, loss of power potential, and safety need to be monitored through testing before stakeholders commit to large capital investments. The amount of existing data in these areas is extremely limited, although several demonstration projects are currently underway.

Further, without the completion of the real-world fleet testing with full loads and full duty cycles, including longer-term mechanical service and reliability over a sufficient demonstration period, a system that later proved to be unreliable would result in disruption and delay of cargo flow and trade at the Port Complex. In recognition of the potential future promise of such technologies, LAHD has included a lease measure (LM) in this document that requires periodic technology reviews (LM AQ-1). This lease measure will ensure that the Tenant reconsiders the feasibility of zero- and near-zero- emission technologies in the future as the technologies continue to develop. In addition, the tenant will be required to confer with LAHD any time they are replacing any on-site Cargo Handling Equipment (CHE).

See below for discussions of specific zero- and near-zero emission demonstrations underway for trucks and container handling equipment. Additionally, see below for information regarding the upcoming zero- and near-zero- emissions yard tractor demonstration project at Evergreen Container Terminal.

Drayage Trucks

In 2006, LAHD co-funded with SCAQMD the world's first plug-in, battery-powered, heavy-duty truck prototype. Subsequently, through the TAP, the Ports of Los Angeles and Long Beach have funded the demonstration of seven TransPower pre-commercial electric drayage trucks, electric drayage infrastructure and charger improvements, and SCAQMD's Zero Emission Cargo Transport II project (which will demonstrate seven trucks including six fuel cell hybrid and one natural gas hybrid.

The Ports of Los Angeles and Long Beach conducted demonstration projects for two battery plug-in trucks and one hydrogen fuel cell hybrid truck. In June 2012, the battery plug-in truck was tested on a dynamometer using a Port-specific duty cycle at University of California Riverside's Center for Environmental Research & Technology. The test provided a baseline for future improvements. Since the dynamometer testing, the battery-powered truck has been tested using empty and fully loaded containers that were loaned to the Port for these tests. In this testing, the unit has accumulated approximately 250 hours of use. In February 2014, a heavy-duty battery electric prototype truck that uses the ElecTruck drive system developed by TransPower successfully hauled a 75,000-pound load up and

down the Gerald Desmond Bridge multiple times. These ElecTruck drive systems were developed for demonstration in real-world drayage service as part of a zero-emission cargo transport demonstration program funded by a U.S. Department of Energy grant and in collaboration with SCAQMD and the Ports of Los Angeles and Long Beach TAP. The seven trucks that use the ElecTruck drive system were assembled and demonstrated by Port drayage truck operators. The hydrogen fuel cell-powered truck has been used in isolated tests. One test at a facility in Commerce, California, included picking up fully loaded containers and traveling over a 6 percent incline grade. Another test was done by a national retailer picking up containers, crossing the Vincent Thomas Bridge, and delivering them to distribution centers. The truck achieved 200 miles on a single tank of hydrogen, and a demonstration of an extended range of 400 miles is planned. These technologies have been promising in initial use and additional hours of usage are currently being accrued. In addition to the demonstration projects mentioned above, information on planned zero-emission truck development can be found at the Port's website: http://www.portoflosangeles.org/environment/zero.asp. Real-world, in-use data is essential, particularly when deploying new technologies on public roads.

The technology of heavy-duty electric drive engines with the potential for zero emissions has advanced greatly in recent years. LAHD has been a leader in developing and testing zero-emission, heavy-duty trucks and has sent a clear message to technology providers that zero-emission technologies are needed as soon as practicable.

Although zero-emission trucks are currently in limited use, development and deployment of this technology involves the following four steps: (1) research and development; (2) technology development and demonstration; (3) pre-production deployment and assessments; and, (4) early production deployments. Real-world, in-use data is essential, particularly when deploying new technologies on public roads As a funding partner in those efforts, LAHD supports accelerating zero-emission technologies through LM AQ-1 required for this proposed Project, among other commitments as described above.

Cargo Handling Equipment (CHE)

LAHD is also focused on the development of zero-emission technologies for CHE and is in the process of developing and testing some off-road CHE. Several different zero-emission technologies for CHE are being developed and demonstration projects that have been completed or are currently underway are discussed below. Most important, CEC funding for the Evergreen Container Terminal will support the testing of electric (zero-) and liquified natural gas (near-zero-) yard tractors.

Zero-Emission Yard Tractors

LAHD has funded numerous zero-emission yard tractor projects through the TAP, including plug-in battery electric yard tractors and a hydrogen fuel cell yard tractor. However, the feasibility of zero-emission technology for yard tractors or the likelihood of availability of zero-emission yard tractors on the market in the near-term has not yet been shown. Testing of zero-emission yard tractors has been ongoing since 2008, including demonstration projects funded by the Port, but testing and demonstration have not yet produced a viable candidate for large-scale testing or use in a marine terminal operation and duty cycle. In 2013, CARB selected the Ports of Los Angeles and Long Beach to be recipients of grant funding for a two-year project to develop and demonstrate two electric yard tractors developed by TransPower. The yard tractors are currently being demonstrated at the Port's APM and PST terminals. Previously these yard tractors have been successfully

demonstrated at the Port's SA Recycling terminal and the Dole terminal at the Port of San Diego. The Port has been proactive in working with manufacturers (such as Balqon and TransPower) to design and produce prototype plug-in electric yard tractors, which operate on lithium-ion batteries. Initial testing of the Balqon yard tractors at the California Cartage Intermodal Facility indicated that the yard tractors were capable of operating for over 12 hours on a single charge. Balqon, however, is no longer producing CHE.

Five battery electric yard tractors are intended to be tested at Evergreen Container Terminal for a period of one year, which is expected to begin in Spring - Summer 2018. Information collected during this demonstration project and others will dictate whether further larger scale demonstrations using 10- to 20- yard tractors are ready to take place. Once the larger scale demonstrations are deemed successful, the electric yard tractors could be ready for commercialization.

The 2010 Hybrid Yard Hostler Demonstration and Commercialization Project was a TAP project that involved three hybrid (diesel-battery-electric) yard tractors. These three hybrid yard tractors were put into service at the Port of Long Beach for a period of 6 months performing ship, rail, and dock work, with a goal of measuring the emissions of a conventional and hybrid yard tractor following cycles developed from monitoring in-use activities. Results indicated that at low loads, the hybrid consumed about 7 percent more fuel and at high loads the hybrid saved about 3 percent fuel, while nitrogen oxide (NOx) emissions were reduced at both load levels. Considering that the results did not indicate fuel savings for the hybrid yard hostler, further refinement of the hybrid drive system design was recommended to improve the yard tractors' fuel economy. The Liquefied Natural Gas (LNG) Yard Hostler Demonstration and Commercialization Project assessed the performance and emissions of three LNG yard tractors over 8 months from June 2006 to January 2007 at the Port of Long Beach. Results indicated that LNG yard tractors used about 30 percent more diesel gallon equivalents than diesel yard hostlers, had higher NOx emissions, and had an incremental cost over a diesel yard truck of approximately $40,000.

ETS (through LAHD) was awarded a grant from the California Energy Commission (CEC) in late 2016 to commission a demonstration project for five zero-emission yard tractors, and 20 near-zero-yard tractors equipped with the California Air Resources Board certified Cummins Westport Low NOx engines (0.02 grams of nitrogen oxides/brake horsepower-hour) at the Everport Container Terminal. The Port has constructed electric charging stations at the Everport Container Terminal in preparation of the five zero-emission yard tractors. To further reduce GHG the 20 near-zero-emission yard tractors will be fueled with renewable LNG provided by Clean Energy via a mobile LNG fueling system. This demonstration project is expected to begin in Spring - Summer 2018 and last for 12 months. In addition, the LAHD was awarded a second CEC grant in early 2017 to commission a demonstration project for two zero-emission battery electric top handlers and three additional zero-emission battery electric yard tractors to undergo a demonstration project at the Everport Container Terminal as well. This demonstration project is expected to begin in Summer 2019 and last for 12 months. The demonstration project's main goal is to determine the long-term feasibility of near-zero yard tractors. More specifically, the project is expected to: (1) significantly reduce emissions of GHGs, diesel particulate matter (DPM), NOx, and reactive organic gases (ROG) from the Evergreen Container Terminal; and (2) create a test facility for the commercialization of zero- and near-zero- emission technologies that can move break bulk and containerized cargo.

Although progress is being made, these examples illustrate the challenges that continue to face developers of zero- and near-zero- emission yard tractors to bring the technology to the market.

Electric Rubber Tire Gantry Cranes (ERTG) and Electric Rail-Mounted Gantry Cranes (ERMGs)

A standard rubber tire gantry crane (RTG) runs on diesel fuel and is used for stacking intermodal containers within the stacking areas of a container terminal. An electric RTG (ERTG) runs primarily on electric power provided by a bus bar, overhead conductor, or cable reel but retains diesel engine capabilities for moving between rows of containers. The extensive infrastructure makes ERTG systems extremely expensive to build and makes the layout and operations highly inflexible, which would be difficult to implement on an existing operational container terminal. As such, ERTG systems are best suited for master-planned terminals where the physical layout and operations are specifically designed to accommodate the ERTG system. Additionally, although the proposed Project involves the renewal of a lease at an existing terminal with some expansion of backlands, the extensive reconfiguration which would be required to utilize such equipment at the terminal is beyond the scope of the proposed Project.

An electric rail-mounted gantry crane (RMG) system is used for stacking intermodal containers. By mounting a gantry crane on rails, ERMGs sacrifice the mobility of their diesel counterparts; however, ERMGs have lower long-term operating costs and provide substantial environmental benefits since ERMGs run entirely on electricity. ERMG systems involve similar financial and operational restrictions to those discussed above for ERTGs, though to a greater degree. ERMGs operate on rail tracks, making them even more operationally restrictive than ERTGs. Additionally, the capital investment and intensity of construction required to develop an ERMG system are greater than for an ERTG system. As with ERTG systems, ERMG systems are best suited for master-planned terminals where the physical layout and operations are specifically designed to accommodate the RMG system. Additionally, although the proposed Project involves the renewal of a lease at an existing terminal with some expansion of backlands, the extensive reconfiguration which would be required to utilize such equipment at the terminal is beyond the scope of this proposed Project.

Hybrid RTGs (EcoCrane™)

In a demonstration project sponsored by the Ports of Los Angeles and Long Beach under the TAP, a hybrid RTG, EcoCrane™ equipped with an advanced energy capture and battery storage system was placed into testing in 2009 and eventually commissioned after initial engineering issues in 2010. While the EcoCrane™ showed reductions in criteria air pollutant emissions, fuel consumption, and GHGs, as compared to a conventional diesel-electric RTG crane, it experienced engineering issues related to inverter failure, battery/inverter compatibility, and generator failure. In August 2010, the LAHD received a grant from the USEPA to demonstrate a second generation EcoCrane™ hybrid RTG system at the West Basin Container Terminal at the Port of Los Angeles. As such, this technology was verified by the USEPA in June 2013 for specific applications and demonstrated a 56 percent fuel economy improvement.

Additional concerns associated with the use of hybrid RTGs include the following: safety hazards posed by potential leaks from battery packs; the need for additional labor staffing on the ground due to the reduced visibility from the size and location of the battery box; the

logistical difficulties associated with the use of the batteries, which must be drained and "equalized" every 21 days, a process that requires eight hours to complete, thereby negatively impacting the use and efficacy of the RTGs; the increased stress fractures noted in equipment welds due to the additional battery weight on one side of the equipment; and the need to dispose of the batteries (which have a useful life of only three years) as hazardous waste (LAHD, 2016).

Ship-to-Shore Cranes

Ship-to-shore cranes are large stationary dockside gantry cranes used for loading and unloading intermodal containers from container ships of various sizes at container terminals. All of the ship-to-shore cranes currently servicing container vessels at the Port are powered by electricity provided from the City of Los Angeles Department of Water and Power.

Conclusion

The LAHD, working collaboratively with Port tenants and other stakeholders, is committed to expanded development and testing of zero-emission technologies, identification of new strategic funding opportunities to support these expanded activities, and planning for long-term infrastructure development to sustain ongoing programs, all while ensuring competitiveness among the maritime goods movement businesses.

As noted above, ZECMS (including drayage trucks, yard tractors, and gantry cranes) require longer-term evaluations to establish the technical viability, operational reliability and the ability to attract participation from established original equipment manufacturers that will lower acquisition and maintenance costs and allow this equipment to become commercially viable. When commercial viability is achieved, the proposed Project lease measure LM AQ-1 was specifically established to integrate these systems into terminal operations. At this time, however, LAHD cannot take mitigation credit for zero-emission technologies for this Project.

2.3.1.3 Master Response 3: Port-wide Emission Reduction Programs

Several comments requested that the LAHD implement additional mitigation beyond what current regulations and the San Pedro Bay Ports Clean Air Action Plan (CAAP) would accomplish. This Master Response addresses these comments.

The Ports of Los Angeles and Long Beach originally developed the CAAP in 2006 with input from a number of stakeholders, including the USEPA, CARB, and SCAQMD. The CAAP was updated in 2010, and underwent a revision in Summer 2017. The Draft CAAP Update was released in July 207 with a tentative adoption date set for November 2017. The CAAP has produced emission reductions of criteria pollutants, toxic air contaminants, and GHG either in excess of those required by existing federal and state regulations, or have accelerated achievement of the reductions anticipated in the regulations. Through the CAAP and the associated programs, emission reduction technologies have been tested and are being developed to produce commercially viable mitigation for Port emission sources. The CAAP and updates, as well as accomplishments of Port-wide emission reduction programs can be reviewed at:

- https://www.portoflosangeles.org/environment/caap.asp

- https://www.portoflosangeles.org/environment/ogv.asp
- https://www.portoflosangeles.org/ctp/idx_ctp.asp
- https://www.portoflosangeles.org/environment/amp.asp
- https://www.portoflosangeles.org/environment/progress/initiatives/technology-advancement-program/

The Ports are committed to updating the CAAP this year, with the Draft 2017 CAAP released for public review in mid-July 2017, with anticipated adoption of the final 2017 CAAP update by the end of 2017. Note that the CAAP will continue to push technological improvements for emission reductions at a pace faster than regulations alone. In addition, the cost of zero-emission technologies can be substantially higher than conventional equipment, making economic feasibility challenging. However, the Ports cannot yet rely on any programs in this update to be available and appropriate for claiming additional emission reductions in the Draft EIS/EIR. As technologies become technologically feasible, economically viable, and commercially available in the region, they will become requirements at the Port of Los Angeles as stated in lease measure LM AQ-1: Replacement of Equipment and Review of New Technology (please see the Draft EIS/EIR, page 3.2-51).

In various comments from regulatory agencies, as well as other stakeholders, on the Draft EIS/EIR, requests were made that the LAHD should implement mitigation measures that, at this time, are not feasible, or for which LAHD lacks jurisdiction to implement.

2.3.1.4 Master Response 4: Energy Usage and Appendix F

Introduction

LAHD respectfully disagrees with the commenter's opinion that the Draft EIR/EIS fails to comply with Appendix F of the State CEQA Guidelines regarding energy consumption, and that the proposed Project would result in a significant impact from energy consumption requiring mitigation. This master response clarifies the assumptions and information contained in the EIS/EIR, and expands upon that information. It does not constitute "significant new information" requiring recirculation. (See PRC Section 21092.1; CEQA Guidelines Section 15088.5.)

Appendix F of the State CEQA Guidelines states that "the goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include the following: decreasing overall per capita consumption; decreasing reliance on fossil fuels such as coal, natural gas and oil, and increasing the reliance on renewable energy sources." The objective of the Everport Container Terminal Improvement Project is to accommodate larger (16,000 TEU), more efficient vessels at the site to improve energy and fuel efficiency and reduce pollution. Currently, the facility can only accommodate 8,000 TEU vessels. Upon project completion, the facility will be able to accommodate 16,000 TEU vessels. These vessels are newer and cleaner burning with the ability to connect to auxiliary maritime power (AMP). Further, accommodating larger vessels significantly reduces vessel transit time to further the goal of improved fuel efficiency at the site.

Appendix F further states that "Potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project." There were no significant energy impacts associated with the proposed Project; in fact, the Project's objective is to improve energy efficiency and the overall efficiency of the facility. This

Project and its overall objective were evaluated against Appendix F and it was determined that many of its components were found to be unnecessary. However, this response has been prepared to further clarify energy consumption related to the proposed Project. Specific areas of focus include the following:

- Energy requirements and energy use by amount and fuel type for construction and operation;
- The effects of the Project on local and regional energy supplies;
- The effects of the Project on peak and base period demands for electricity;
- Compliance with energy standards;
- Effects of the Project on energy resources;
- The Project's projected transportation energy use requirements and overall use of efficient transportation alternative; and
- Energy conservation measures that have been incorporated into the Final EIS/EIR.

The proposed Project, in combination with improved fuel standards and energy efficient technology, would achieve the abovementioned objectives outlined in Appendix F. The proposed Project includes a throughput increase yet the per-container energy usage decreases over time. This decrease can also be compared to the No Project Alternative which still accounts for natural growth at the site without the project and still shows fuel efficiency. This decrease is attributable to several factors that include cleaner, newer, more efficient replacement equipment over time; increases in regulations and policies related to energy consumption; and mitigation measures imposed on the proposed Project to conserve or reduce energy consumption to the maximum extent feasible. In addition, the facility itself has embarked on two different zero- and near-zero emission demonstration projects that may also decrease the facility's use of fossil fuels.

To demonstrate the operational fuel efficiency of the proposed Project, for the CEQA Baseline, 2038 CEQA No Project and the 2038 Proposed Project, energy demand was calculated and energy consumed per TEU processed by the Everport Container Terminal for the following energy categories: Diesel Fuel, Gasoline Fuel, and Electricity. The comparisons between the CEQA and NEPA Baselines and the 2038 Proposed Project shows the positive effect that the project would have in preventing wasteful, inefficient, and unnecessary consumption of energy. Efficiency breakdowns and energy per TEU reductions associated with the proposed Project over the CEQA and NEPA baselines were calculated for each source type. For energy sources consuming electricity, the same 2013 CO2e per MWh emission factor was used for the CEQA Baseline as for the 2038 Proposed Project. Thus, this analysis does not take credit for reductions in electricity emission rates associated with the introduction of higher percentages of renewable resources that would happen irrespective of the proposed Project.

Table MR 4-1: Operational Energy Consumption per TEU for Proposed Project year 2038 and CEQA Baseline and CEQA No Project year 2038

Scenario	Source Type	Fuel Consumed *Gallons for Fuels MWh for Electricity*	Annual TEUs Handled	Energy per TEU *Gallons for Fuels MWh for Electricity*	Percent Reduction in Energy per TEU over CEQA Baseline*
CEQA Baseline	Ships - Transit and Anchoring	4,911,775	1,240,773	3.96	
	Ships - Hoteling	1,323,067	1,240,773	1.07	
	AMP Electricity Use	4,374	1,240,773	0.0035	
	Tugboats	61,513	1,240,773	0.05	
	Trucks	5,552,690	956,755	5.80	
	Line Haul Locomotives	1,868,632	284,018	6.58	
	Switch Locomotives	25,877		0.09	
	Cargo Handling Equipment	1,823,044	1,240,773	1.47	
	On-terminal Electricity Use	8,026	1,240,773	0.0065	
	Worker Vehicles	223,386	0	0.00	
	Total Operations - Diesel	**15,566,598**	**1,240,773**	**12.55**	
	Total Operations - Gasoline	**223,386**	**0**	**0.00**	
	Total Operations - Electricity	**1,827,418**	**1,240,773**	**1.47**	
CEQA No Project Year 2038	Ships - Transit and Anchoring	7,273,573	1,818,000	4.00	-1%
	Ships - Hoteling	1,167,071	1,818,000	0.64	40%
	AMP Electricity Use	7,906	1,818,000	0.0043	-23%
	Tugboats	105,310	1,818,000	0.06	-17%
	Trucks	4,715,033	1,090,800	4.32	26%
	Line Haul Locomotives	4,659,527	727,200	6.41	3%
	Switch Locomotives	68,492		0.09	-3%
	Cargo Handling Equipment	2,199,601	1,818,000	1.21	18%
	On-terminal Electricity Use	7,547	1,818,000	0.0042	36%
	Worker Vehicles	319,107	0	0.00	0%
	Total Operations - Diesel	**20,188,606**	**1,818,000**	**11.10**	**11%**
	Total Operations - Gasoline	**319,107**	**0**	**0.00**	**0%**
	Total Operations - Electricity	**2,207,506**	**1,818,000**	**1.21**	**18%**
Proposed Project Year 2038	Ships - Transit and Anchoring	6,921,621	2,379,525	2.91	27%
	Ships - Hoteling	1,505,933	2,379,525	0.63	41%
	AMP Electricity Use	13,186	2,379,525	0.0055	-57%
	Tugboats	105,310	2,379,525	0.04	11%
	Trucks	6,628,722	1,427,715	4.64	20%
	Line Haul Locomotives	5,988,823	951,810	6.29	4%
	Switch Locomotives	89,655		0.09	-3%
	Cargo Handling Equipment	3,357,223	2,379,525	1.41	4%

	On-terminal Electricity Use	9,280	2,379,525	0.0039	40%
	Worker Vehicles	380,859	0	0.00	0%
	Total Operations - Diesel	**24,597,286**	**2,379,525**	**10.34**	**18%**
	Total Operations - Gasoline	**380,859**	**0**	**0.00**	**0%**
	Total Operations - Electricity	**3,370,409**	**2,379,525**	**1.42**	**4%**

* The change in energy consumption per TEU relative to the existing conditions (CEQA Baseline) if provided for both the 2038 No Project and 2038 Proposed Project scenarios to allow the reader to compare future energy consumption without and with the project, respectively.

Energy consumption data related to the proposed Project can be found throughout the Draft EIS/EIR as it is an integral data component of addressing and identifying air quality impacts related to emissions of criteria pollutants and greenhouse gases from the proposed Project as well as all project alternatives. For example, Appendix B1 highlights air quality calculations, methodology and assumptions and includes fuel usage in order to complete the calculations. Sections 3.2, Air Quality and Meteorology, and 3.5, Greenhouse Gas Emissions, highlight mitigation measures that effectively conserve energy as well highlight existing regulations related to GHGs and air quality that have secondary benefits related to energy conservation.

Energy Requirements and Energy Use by Amount and Fuel Type

Construction

Energy (primarily as diesel fuel, but including minor amounts of gasoline) would be used during construction of the proposed Project. Project construction activities and elements for which energy consumption was calculated include: (a) off-road diesel-powered construction equipment; (b) on-road diesel-powered delivery and haul trucks; and (c) worker commute vehicles. Energy expenditures during construction would be temporary, lasting for approximately 24 months. These energy expenditures are short-term but necessary to achieve the overall objective of the Project; which is the efficiency of the terminal and the associated reduction of fuel consumption.

Construction would not result in substantial waste or inefficient use of energy. The construction of the improvements would undergo a competitive bid that includes energy conservation measures in the bid specifications that must be adhered to throughout the construction process. In addition, construction would be consistent with the policies in the Port of Los Angeles' Sustainable Construction Guidelines, which guide the content of bid specifications. Current LAHD bid specifications include provisions to reduce energy consumption, such as staging work during nonpeak hours when appropriate, and minimum engine emissions standards for construction equipment in accordance with the Clean Air Action Plan. Accordingly, construction would comply with all existing energy standards.

Further, because construction would occur at an existing terminal, the site will have limited operation during this time period so energy consumption related to existing operations will decrease while construction is occurring helping to offset energy demand from construction.

Total construction energy efficiency for the proposed Project is presented below for informational purposes.

Table MR 4-2: Construction Energy Consumption for Proposed Project Ocean Disposal

Proposed Project Construction - Ocean Disposal	Year	Fuel	GHG Emissions (Metric Tons)	Fuel Consumed (Gallons)
Off-road Construction Equipment	2018	Diesel	2,148	211,407
Marine Source Exhaust	2018	Diesel	477	46,947
On-road Construction-Related Vehicles	2018	Diesel	1,014	99,798
Worker Vehicles	2018	Gasoline	21	2,362
Off-road Construction Equipment	2019	Diesel	161	15,846
Marine Source Exhaust	2019	Diesel	800	78,736
On-road Construction-Related Vehicles	2019	Diesel	118	11,614
Worker Vehicles	2019	Gasoline	10	1,125
Total Construction - Diesel	**ALL**	**Diesel**	**4,718**	**464,348**
Total Construction - Gasoline	**ALL**	**Gasoline**	**31**	**3,487**

Operation

Operational electricity demands of the proposed Project would be related to additional wharf cranes, additional AMP vaults, and additional facility and backland operations. The new wharf cranes would represent a new electrical demand, since the existing cranes would remain in use as would the additional AMP vaults. However, these taller cranes are necessary to accommodate the larger vessels and further the goal of accommodating these larger vessels that are generally cleaner, more able to plug in to AMP and will allow for the goal of increased container throughput with as few vessel trips as possible. . Truck trips would increase as well as on-dock rail activity to accommodate the increase throughput. Please see Table MR 4-1 above for operation-related fuel consumption estimates on a per TEU basis associated with the proposed Project.

Effects of the Project on Local and Regional Energy Supplies

Consistent with the goal of conserving energy expressed in CEQA Guidelines Appendix F, the proposed Project would include decreased reliance on fossil fuels through the accommodation of larger vessels thereby reducing significant transiting time and unnecessary fuel consumption. Future operations would be subject to the Port of Los Angeles' conservation and sustainability goals, standards, and initiatives, as set forth in the Sustainability Assessment and Plan Formation (LAHD, 2008). These include a number of programs under the Clean Air Action Plan (currently being updated), various greenhouse gas reduction and zero-emissions programs, recycling and other sustainability programs, and the Port Leasing Policy. The increased use of trains to transport containers directly from the terminal would represent a more fuel-efficient mode than trucking containers to off-dock yards. Energy conservation measures were also incorporated into the document through mitigation that will further the goal of fuel efficiency and decreased energy consumption. Finally, the Port's Energy Management Action Plan and Alternative Energy Program would promote increasing efficiency of energy usage in terminal operations.

The Effects of the Project on Peak and Base Period Demands for Electricity

The Los Angeles Department of Water and Power (LADWP) is charged with maintaining sufficient capability to provide its customers with a reliable supply of power, and will continue to do so with proper planning and development of facilities in accordance with the City Charter, using such mechanisms as the Power Integrated Resources Plan (IRP). Based

on the LADWP Power IRP, electricity resources and reserves at LADWP will adequately provide electricity for all of its customers, including the proposed Project, through the current Power IRP planning horizon of 2040 (LADWP, 2016). Furthermore, because LADWP is moving toward increasing renewable energy supplies in its resource portfolio, the electricity demand of the proposed Project, by itself, would not result in the need to construct a new off-site power station or facility.

Fuel consumption from the proposed Project does not pose a significant adverse impact to energy. The Project decreases its energy consumption on a per TEU basis over time thereby achieving the objectives outlined in Appendix F.

Compliance with Energy Standards

Over time, implementation of the proposed Project would replace older, less efficient pieces of equipment and vehicles. The improved terminal will be required to comply with current state energy efficiency standards and regulations pursuant to the California Building Code (CBC), California Green Building Standards (CALGreen) and City of Los Angeles Green Building Code (LAGBC) that would reduce long-term energy demand. These requirements would reduce wasteful, inefficient and unnecessary consumption of energy over the long-term. Additional information regarding these and other regulations and programs that support energy conservation through the reduction of GHGs are described in further details for information purposes below. In addition, summaries of some of these regulations can be found in Appendix B1 as well. All of these regulations will be complied with as applicable for the proposed Project.

Natural Gas and Electricity Infrastructure

Electrical power within the City of Los Angeles is supplied by LADWP, which serves approximately 3.8 million people. LADWP obtains electricity from various generating sources that utilize coal, nuclear, natural gas, hydroelectric and renewable resources to generate power. Its current system capacity is 7,630 megawatts (MW). LADWP does not forecast that peak demand will reach capacity through 2040. LADWP is committed to increasing the share of renewable energy and promoting increased energy efficiency and conservation by its customers. Diversification of LADWP's energy portfolio, increasing electricity through renewable energy and new customer energy efficiency measures will all help meeting the City needs.

According to the most recent data available from the LADWP, approximately 23 percent of its electricity purchases in 2013 were from eligible renewable sources. LADWP has adopted a number of initiatives to increase its use of renewable energy resources to support the goal of reducing GHG emissions, reducing reliance on fossil fuels and meeting state mandates requiring all utilities to provide 33 percent of their energy from renewable resources by 2020.

Existing energy infrastructure has sufficient capacity to accommodate the needs of its 3.8 million people along with sufficient capacity to accommodate the Everport Container Terminal Project. The regulations listed below must be complied with throughout the Project to further ensure that the Project will not result in wasteful, inefficient or unnecessary consumption of electricity or natural gas.

Green LA

In May 2007, the City of Los Angeles introduced Green LA – An Action Plan to Lead the Nation in Fighting Global Warming (Green LA). Green LA presents a framework targeted

to reduce the City's GHG emissions by 35 percent below 1990 levels by 2030. The plan calls for an increase in the City's use of renewable energy to 35 percent by 2020 in combination with promoting water conservation, improving the transportation system, reducing waste generation, greening the ports and airports, creating more parks and open space and greening the economic sector. Green LA identifies objectives and actions in various focus areas.

Executive Directive No. 10

Executive Directive No. 10 was issued in 2007 regarding environmental stewardship practices. Consistent with the goal specified in Green LA, Executive Directive No. 10 requires that City departments create a "Statement of Sustainable Building Policies" including sustainable design, energy and atmosphere, materials and resources, water efficiency, landscaping and transportation resources. City departments are required to submit annual sustainability reports to the Mayor for review.

Sustainable City Plan

In 2014, Mayor Eric Garcetti launched the City of Los Angeles's first-ever Sustainable City Plan. The pLAn is a comprehensive policy roadmap that prepares the City for an environmentally healthy, economically prosperous and equitable future. The framework of the pLAn includes the vision of things to be accomplished over the next 20 years and highlights near-and long-term outcomes. Through the pLAn, the City's goal is to become a national leader in carbon reduction and climate action by eliminating coal from the City's energy mix, prioritizing energy efficiency, and inspiring other cities to take similar action. The pLAn sets targets of reducing GHG emissions below 1990 levels by at least 45 percent by 2025, 60 percent by 2035 and 80 percent by 2050.

LAHD Sustainable Construction Guidelines

In February 2008, the LAHD Board of Harbor Commissioners adopted the Los Angeles Harbor Department Sustainable Construction Guidelines for Reducing Air Emissions (LAHD Construction Guidelines). These guidelines will be used to establish air emission criteria for inclusion in construction bid specifications. The LAHD Construction Guidelines reinforce and require sustainability measures during performance of the contracts, balancing the need to protect the environment, be socially responsible, and provide for the economic development of the Port. The intent of the LAHD Construction Guidelines is to facilitate the integration of sustainable concepts and practices into all capital projects at the Port and to phase in the implementation of these procedures in a practical yet aggressive manner. These Guidelines are currently being revised to include additional measures to ensure that construction activities are conducted in the most sustainable manner possible.

San Pedro Bay Ports Clean Air Action Plan (CAAP)

In 2006, the ports of Long Beach and Los Angeles created and approved the San Pedro Bay Ports Clean Air Action Plan, or "CAAP." The CAAP provides the overall strategy for dramatically reducing air pollution emissions from cargo movement in and around the Ports. The Ports updated the CAAP in 2010 with new strategies and emission-reduction targets. Since the adoption of the original CAAP, diesel particulate emissions from mobile sources in and around the Ports are down 84 percent. Despite this significant progress, the Ports recognize that more needs to be done. The CAAP 2017 Update provides new and updated strategies and emission-reduction targets to cut emissions from sources operating in and around the Ports, setting the Ports firmly on the path toward zero-emissions goods movement.

The CAAP 2017 Update contains 14 strategies to reduce emissions from sources in and around the Ports, plan for zero-emissions infrastructure, encourage freight efficiency, and address energy resources. These strategies include:

- Advancing the Clean Trucks Program to phase out older trucks and transition to zero-emission trucks by 2035;
- Support and advance state-led efforts to transition terminal equipment to zero emissions by 2030;
- Further reducing emissions from ships at-berth, and transitioning the oldest, most polluting ships out of the San Pedro Bay fleet;
- Accelerating the deployment of cleaner harbor craft engines and operational strategies to reduce harbor craft emissions;
- Expanding use of on-dock rail to shift more cargo leaving the port to go by rail;
- Reduce population-weighted residential cancer risk of Port-related DPM emissions by 85 percent by 2020;
- Reduce port-related emissions by 59 percent for NOx, 93 percent for SOx and 77 percent for DPM by 2023; and,
- Reduce GHGs from port-related sources to 40 percent below 1990 level by 2030 and 80 percent below 1990 levels by 2050.

Effects of the Project on Energy Resources

As discussed above, the overall objective of the proposed Project is to reduce fuel consumption and improve energy efficiency. The Project consists of short-term construction impacts to achieve long-term fuel consumption benefits. There is no significant adverse effect on energy resources as a result of the proposed Project. Construction-related fuel usage would be short-term and necessary to further the overall goal of fuel efficiency at the terminal. In addition, energy conservation measures have been incorporated into construction and operation of the proposed Project wherever feasible to further reduce energy consumption when possible (see below).

Transportation Energy Use Requirements

In addition to the abovementioned policies and regulations pertaining to energy usage, there are numerous adopted ordinances related to energy efficiency as well. Below please find a list of regulations that also apply to the project and its construction to ensure that energy is conserved to the maximum extent feasible.

- Renewable Portfolio Standard
- LADWP Power Plan
- Climate LA
- GHG and Fuel Efficiency Standards for Passenger Cars and Light-Duty Trucks
- AB 1493 – Pavley
- California Advanced Clean Cars/Zero Emission Vehicle Program

Energy Conservation Mitigation Measures

Although fuel consumption and energy usage decreases with time as a result of the Project, energy conservation measures have nonetheless been incorporated into the Draft EIR where feasible, including the following:

- MM AQ-2 – On-road Trucks Used During Construction (increase fuel efficiency)
- MM AQ-3 – Non-Road Construction Equipment (increase fuel efficiency)
- MM AQ-6 – Vessel Speed Reduction Program (VSRP) (increase fuel efficiency)
- MM AQ-7 – Alternative Maritime Power (AMP) (reduction in use of fossil fuels by allowing electric plug-in capability)
- LM AQ-1 – Replacement of Equipment and Review of New Technology (may result in fuel efficiency depending upon results of technology review)
- LM AQ-2 – Priority Access System (potential fuel efficiency from reduced idling at the gate)
- MM GHG-1 – LED Lighting (electricity reduction)
- MM GHG-2 – Solar Electricity (electricity reduction)
- LM GHG-1 – GHG Credit Fund (funding local programs aimed at the reduction of GHGs and generally result in a decrease on the reliance of fossil fuels)

These measures can be found Section 3.2, Air Quality and Meteorology and Section 3.5, Greenhouse Gas Emissions, as well as in the Mitigation Monitoring and Reporting Program for the Project. These mitigation measures and lease measures not only have the direct benefit of reducing emissions of GHGs and criteria pollutants but they have the secondary benefit of reducing energy consumption and usage (see above).

In addition to the mitigation measures described above, the facility was awarded two separate grants and has voluntarily agreed to participate in two demonstration projects related to the use of zero-emission and zero-emission equivalent cargo handling equipment at the facility. Everport will be utilizing 20 zero-emission equivalent (ultra-low NOx with renewable natural gas) yard tractors, eight battery electric yard tractors, and two battery electric top picks. In total, 30 pieces of equipment will undergo testing for a period of approximately 12 months. If this equipment proves feasible and successful at the site, it may be a viable replacement in the future and help further the goal of reducing the reliance on fossil fuels at the site.

The proposed Project does not pose a significant adverse impact to energy usage. The proposed Project seeks to avoid any wasteful, unnecessary or inefficient consumption of energy and modify the facility to achieve these objectives. As stated above, energy consumption decreases over time at the Project site through the use of cleaner equipment, compliance with regulations and policies and implementation of the mitigation measures and lease measure described above. Because there are no energy impacts, there are also no unavoidable adverse effects nor is there an irreversible commitment of resources or growth-inducing effects created or exacerbated by the Project.

2.3.2 Federal Government Comments

-----Original Message-----
From: Bryant Chesney - NOAA Federal [mailto:bryant.chesney@noaa.gov]
Sent: Wednesday, May 31, 2017 10:29 AM
To: Stevens, Theresa CIV USARMY CESPL (US) <Theresa.Stevens@usace.army.mil>
Subject: [Non-DoD Source] Berths 226-236 Everport Container Terminal Improvements Project

Theresa,

NOAA's National Marine Fisheries Service (NMFS) has reviewed the U.S. Army Corps of Engineers (USACE) letter dated April 21, 2017, and the Essential Fish Habitat (EFH) Assessment, for the Los Angeles Harbor Department's (LAHD) proposed terminal improvement project at Berths 226-236. NMFS generally concurs with the adverse effect determination made within the EFH Assessment. The proposed project would not result in a permanent loss of EFH, and adverse impacts to the quality of EFH are not expected to be substantial. The USACE would require best management practices to address temporary adverse impacts associated with increased noise and turbidity. There are currently no feasible project-specific mitigation measures to reduce the potential for the introduction of invasive species via hull fouling. Therefore, NMFS has no additional EFH conservation recommendations to provide for the LAHD's proposed terminal improvement project. Thank you for consulting with NMFS.

NMFS-1

Regards,
Bryant

_____

2.3.2.1 U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS)

Response to Comment NMFS-1

Thank you for your review of the Draft EIS/EIR. The comment is noted. Potential impacts and mitigation measures for noise and turbidity are discussed in Sections 3.10.4.3 and 3.11.4.3, respectively, of the Draft EIS/EIR.

The Marine Invasive Species Program intended to prevent the spread of invasive species is discussed in Section 3.3.3.7 of the Draft EIR/EIS. Potential impacts from invasive species are discussed in Section 3.3.4.3, Impact BIO-3, of the Draft EIS/EIR. All marine vessels associated with project operation would be required to adhere to the Marine Invasive Species Act, specifically those directives included under 2007 Assembly Bill (AB 740) that prescribe measures to prevent hull fouling, such as regular hull cleaning and maintenance.

The comment generally concurs with the findings of the Draft EIS/EIR; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
333 Bush Street, Suite 515
San Francisco, California, 94104

IN REPLY REFER TO:
(ER 17/0198)

Filed Electronically

June 4, 2017

Theresa Stevens
U.S. Army Corp of Engineers
Los Angeles District
Regulatory Division
2121 Alessandro Drive, Suite 110
Ventura, CA 93001

Subject: Draft Environmental Impact Statement by the Army Corps of Engineers for the Berths 226-236 [Everport] Container Terminal Improvements Project – Port of Los Angeles, California

Dear Ms. Stevens:

The Department of the Interior has no comments on the Draft Environmental Impact Statement for the Berths 226-236 [Everport] Container Terminal Improvements Project – Port of Los Angeles, California. Thank you for the opportunity to review this project. If you have any questions, pleases call me at (415) 296-3355. USDOI-1

Sincerely,

Janet L. Whitlock
Regional Environmental Officer

Cc:
Cheryl Kelly, DOI, OEPC
Alan Schmierer, NPS
Michael Norris, USGS
Ellen McBride, FWS
John Rydzik, BIA
Elizabeth Meyer-Shields, BLM

2.3.2.2 U.S. Department of Interior (USDOI)

Response to Comment USDOI-1

Thank you for your comment on the Draft EIS/EIR. LAHD and USACE acknowledge the U.S. Department of the Interior's review and that no comments are provided; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

June 5, 2017

Ms. Theresa Stevens, Ph.D.
U.S. Army Corps of Engineers
Los Angeles District, Regulatory Division
Ventura Field Office
2151 Alessandro Drive, Suite 110
Ventura, California 93001

Subject: Draft Environmental Impact Statement/Report (EIS/EIR) for the Berths 226-236 [Everport] Container Terminal Improvements Project, Los Angeles, California (EIS No. 20170060)

Dear Ms. Stevens:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement/Report (EIS/EIR) for the Everport Container Terminal (ECT) Improvements Project. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The U.S. Army Corps of Engineers (USACE) proposes to dredge at Berths 226-229 and Berths 230-232 in order to accommodate the fleet of larger vessels expected to call at ECT through 2038. The proposed project would also include various infrastructure improvements to manage the resulting increase in throughput, which is expected to reach 2,379,525 twenty-foot equivalents (TEUs) annually by 2033.

EPA recognizes the significant long-term operational air quality improvements that the applicant, Los Angeles Harbor Department (LAHD), has made over the years, particularly its efforts to reduce diesel particulate matter emissions and health risks to neighboring communities. Construction and operation of the proposed terminal redevelopment project, however, would result in greater emissions from ECT.

While we applaud the efforts already underway to deploy effective control technologies at ECT, EPA is concerned about the project-related air quality impacts that would remain significant after the project is completed and proposed mitigation measures are implemented. Based on our concerns regarding the project's air quality impacts, we have rated the action alternatives as *Environmental Concerns—Insufficient Information, EC-2* (see attached "Summary of the EPA Rating System"). Given the anticipated adverse health impacts to the general population and vulnerable low-income and minority communities, in an area with some of the nation's worst air quality, we strongly encourage USACE to work with LAHD to explore additional opportunities to reduce emissions associated with the project. Additionally, we recommend that LAHD and USACE use information gathered from public outreach efforts to design mitigation measures that respond to the needs of adjacent communities that would be adversely affected by the project. Our concerns and recommendations are discussed further in the enclosed detailed comments. USEPA-1

EPA appreciates the opportunity to review this Draft EIS. When the Final EIS is released for public review, please send one copy to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or contact Morgan Capilla, the lead reviewer for this project, at 415-972-3504 or capilla.morgan@epa.gov. USEPA-2

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Section

Enclosures: Summary of EPA Rating Definitions
EPA's Detailed Comments

Electronic copy: Christopher Cannon, Port of Los Angeles
John Hummer, U.S. Maritime Administration
Susan Nakamura, South Coast Air Quality Management District
Robbie Morris, California Air Resources Board
Jason Roach, Caltrans District 7

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

USEPA-3

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment

Air Quality and Environmental Justice

EPA recognizes the efforts that the U.S. Army Corps of Engineers (USACE) and the Los Angeles Harbor Department (LAHD) have put forth to reduce emissions associated with the proposed project. We commend LAHD for its pursuit of 2010 Clean Air Action Plan (CAAP) goals, particularly its commitment to the Vessel Speed Reduction Program and Alternative Maritime Power. We also support Everport Terminal Services's (ETS's) proactive participation in zero-and near-zero-emission technology demonstrations, and encourage continued pursuit of these opportunities in the future.

Notwithstanding the above, EPA is concerned about the increase in ambient air pollution that would result from the Proposed Action after mitigation. The project area is located within the South Coast Air Basin (SCAB), an area that faces some of the worst air quality in the country. EPA currently designates SCAB as an extreme nonattainment area for ozone and a serious nonattainment area for particulate matter of less than 2.5 microns ($PM_{2.5}$). Chapter 3 of the Draft Environmental Impact Statement (DEIS) notes that air quality impacts from the proposed project would remain significant after mitigation, thus contributing to the poor air quality in the project area. Peak daily emissions from construction would exceed South Coast Air Quality Management District (SCAQMD) thresholds for volatile organic compounds (VOC) and nitrogen oxides (NOx), as well as SCAQMD thresholds for federal one-hour nitrogen dioxide (NO_2). Project operational emissions would exceed SCAQMD thresholds for VOC, NOx, and carbon monoxide (CO), as well as the SCAQMD off-site threshold for particulate matter of less than 10 microns (PM_{10}). Construction emissions would also exceed federal *de minimis* levels for NOx in 2018. USEPA-4 cont.

Recommendations:

- Given the severe air quality issues within the project area and the residual impacts that would result from the proposed project, we recommend that USACE work with LAHD to consider including the following mitigation measures in the Final EIS (FEIS) to reduce emissions to the greatest extent feasible.[1]
    - *On-Highway Vehicles*: Require on-highway vehicles servicing ECT to meet or exceed EPA exhaust emissions standards for model year 2010 and newer heavy-duty on-highway compression-ignition engines (e.g., drayage trucks, long haul trucks, refuse haulers, etc.).[2]
    - *Marine Vessels*: Require marine vessels, including all dredging equipment, servicing ECT to meet or exceed the latest EPA exhaust emissions standards for marine compression-ignition engines (i.e., Tier 4 for Category 1 & 2 vessels, and Tier 3 for Category 3 vessels).[3]
    - *Locomotives*: Require locomotives servicing ECT to meet or exceed EPA Tier 4 exhaust

[1] Allow exemptions only if: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

[2] See EPA's Exhaust Emission Standards for Heavy-Duty Highway Compression-Ignition Engines and Urban Buses. Available at: https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100O9ZZ.pdf

[3] See EPA's Exhaust Emission Standards for Federal Marine Compression-Ignition (CI) Engines. Available at: https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100OA0B.pdf

emissions standards for line-haul and switch locomotive engines.[4]
    - *Cargo-Handling Equipment:* Require all cargo-handling equipment to be zero-emissions, subject to equipment availability, by 2030, as envisioned in the draft 2017 Clean Air Action Plan Discussion Document.[5] USEPA-4 cont.
- Discuss, in the FEIS, the minimum performance requirements of mitigation measures Air Quality (AQ)-2 and AQ-3 that would be instated if contractors are unable to access the specified technologies, and describe how partial implementation of mitigation measures would influence emissions estimates.
- Include a commitment to all proposed mitigation measures, and any port-wide mitigation that would reduce air quality impacts, in the FEIS and Record of Decision (ROD).
- Consider updating Table 3.2-1 with information from EPA's Criteria Air Pollutant web resource.[6]

Chapter 5 of the DEIS indicates that, under the mitigated scenario, the Proposed Action would result in significant, disproportionate air quality impacts—including a cumulatively considerable contribution to cancer risk—to low-income and minority communities in and around the project area. Section 5.4.2.1 identifies a multitude of health risks that these communities could face, such as decreased lung function, adverse birth outcomes, asthma exacerbation, among others, due to project-related emissions. Such populations are already heavily impacted by poor air quality, a condition that could be exacerbated by the Proposed Action, when considered cumulatively with other proposed projects around the Port. USEPA-5

According to Chapter 2, the Proposed Action would result in 7,028 average daily truck trips during peak months in 2038—an increase of 2,213 average daily truck trips compared to the NEPA baseline (p. 2-4). Figure 3-1 of Appendix B2, which illustrates offsite vehicle source locations, suggests that truck routes associated with the project would traverse low-income and minority communities identified in Figures 5-1 and 5-2 of Chapter 5; however, this map does not indicate the number of trucks expected to use each route. Disclosure of such information is important to inform decision-making regarding project design and mitigation needs, and to enable affected communities to understand how the project would impact their neighborhoods and health. USEPA-6

EPA supports Lease Measure (LM) AQ-2, which would allow zero- and near-zero-emission trucks priority access to ECT. We are concerned about the timing of this measure, given that truck emissions are projected to be at their highest in earlier years of the project (Table 3.2-20).

Recommendations:

- Disclose the expected distribution of drayage truck traffic among the identified routes associated with the Proposed Action.
- Identify and evaluate any additional mitigation measures that could offset health impacts within communities that would experience high concentrations of project-related truck traffic, such as targeted air quality monitoring and adaptive management in highly affected areas, planting of shade trees along affected corridors, and the installation of air filtration systems in buildings that USEPA-7

[4] See EPA's Exhaust Emission Standards for Locomotives. Available at: https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100OA09.pdf

[5] San Pedro Bay Ports Clean Air Action Plan, 2017. Available at: http://www.cleanairactionplan.org/wp-content/uploads/2016/11/CAAP-2017-Draft-Discussion-Document-FINAL.pdf

[6] Available at: https://www.epa.gov/criteria-air-pollutants

house or serve sensitive receptors located near affected areas.

- Establish a more rigorous timeframe for implementing the priority access system described in LM AQ-2 and explore other incentives to promote earlier adoption of zero- and near-zero-emission truck technologies.

USEPA-7 cont.

Maximizing the efficiency of freight movement is important to minimize the project's air emissions. EPA understands that LAHD has been testing new technologies that could improve the number of "dual transaction" trips and yield additional efficiencies at the Port. For example, Yusen Terminal Inc. (YTI) participated in a pilot program for the Freight Advanced Traveler Information System (FRATIS) to improve drayage truck and container handling, which could lead to increases in dual transactions.[7] It is unclear whether this technology has been expanded to ECT.

USEPA-8

Recommendation: In the FEIS, discuss the results, if available, of YTI's FRATIS pilot program and the potential for the FRATIS system to reduce single transactions associated with the Proposed Action. Consider incorporating FRATIS or other measures to increase the number of dual transactions at ECT into the project description.

The DEIS notes that USACE and LAHD made "considerable efforts to provide public outreach beyond what is minimally required by environmental or agency guidelines" (p. 5-38). EPA commends the lead agencies for this proactive community engagement. Information gained through such efforts can be useful in identifying appropriate project design and/or mitigation measures.

USEPA-9

Chapter 7 of the DEIS provides a brief description of the Port Community Mitigation Trust Fund (PCMTF), a port-wide program that endeavors to "address the negative cumulative environmental and public health impacts created by the business operations at the Port" (p. 7-29). The DEIS does not disclose whether or how the project would contribute to the PCMTF, nor whether any activities undertaken with PCMTF funding would be relevant to any of the proposed project's impacts.

Recommendations:

- In the FEIS, summarize the main concerns expressed by community members during public meetings, and explain how the proposed mitigation measures would address those concerns. Identify any measures that were developed in response to concerns raised by the public, and any additional measures that could offset residual air quality health impacts of the Proposed Action to low-income and minority communities. EPA is available to participate as a partner with the community and the lead agencies to assist in the identification of mitigation opportunities.
- Disclose whether and, if so, how the Proposed Action would contribute to the PCMTF, including: (1) the amount of money that would be contributed; (2) the activities the funds could potentially support; and (3) the monitoring and evaluation methods used to measure the PCMTF's effectiveness.

USEPA-10

Traffic

Traffic congestion can adversely affect local air quality and community health. Chapter 3, Section 6 of the DEIS notes that the Proposed Action would result in significant traffic impacts at the Ferry Street

USEPA-11

[7] See "Freight Advanced Traveler Information System (FRATIS)," U.S. Department of Transportation. Available at: https://www.its.dot.gov/research_archives/dma/bundle/fratis_plan.htm

and State Route 47 (SR-47) intersection in years 2026 and 2038. The DEIS states that, because this intersection is within Caltrans's right-of way and not owned by the City of Los Angeles, "no mitigation is within the Port's jurisdictional control that could reduce the intersection impact to a less than significant level" (p. 3.6-2). Please note that guidance issued by the Council on Environmental Quality states that an EIS should identify "all relevant, reasonable mitigation measures that could improve the project…even if they are outside the jurisdiction of the lead agency or the cooperating agencies."[8] USEPA-11 cont.

> ***Recommendations***: Coordinate with Caltrans to identify transportation system improvements (e.g., intersection improvements, additional signaling) that could reduce traffic impacts at Ferry Street and SR-47 to a less-than-significant level during years 2026 and 2038. In the FEIS, disclose such measures and the potential process and funding mechanisms for their implementation.

Solar Electricity

The DEIS states that photovoltaic panels would be installed over the employee parking lot, pending a feasibility study, as a mitigation measure for the proposed project's significant greenhouse gas emissions (p. 3.5-33). EPA commends USACE and LAHD for this mitigation measure, as the project location appears to be conducive to solar energy generation, and shading parking areas can also reduce evaporative emissions of air pollutants from parked vehicles. USEPA-12

> ***Recommendation:*** Include a commitment to the installation of photovoltaic panels over the employee parking lot in the FEIS and ROD, assuming that such installation is feasible. Disclose the conditions that will be used to determine feasibility of this measure.

Dredged Material

The DEIS correctly states that the Dredged Material Management Team (DMMT), including EPA, found dredged sediment associated with the Proposed Action to be suitable for ocean placement. It should also be noted that final concurrence by EPA on disposal site use conditions is required prior to ocean disposal occurring. Under the Marine Protection, Research, and Sanctuaries Act (MPRSA), EPA must consider impacts to human health and the marine environment when evaluating the suitability of sediment placement options. Appendix F2 to the DEIS discusses only the human health effects of placing dredged sediment at the LA-2 Ocean Disposal Site (p. 6). USEPA-13

> ***Recommendations:***
> - Clarify, in the FEIS, that final concurrence must be obtained from EPA prior to use of the ocean disposal site.
> - Revise Appendix F2 to demonstrate that disposing of dredged sediment at LA-2 would not significantly affect human health or the marine environment.

[8] See the Council on Environmental Quality's (CEQ's) *Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations*, Question 19b. Available at: https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf

2.3.2.3 U.S. Environmental Protection Agency, Region IX (USEPA)

Response to Comment USEPA-1

The comment is noted. Although the commenter applauds the LAHD for the significant long-term operational air quality improvements, an USEPA rating of EC-2 (Environmental Concerns – Insufficient Information) was given due to concerns about significant air quality impacts. It recommends that the USACE and LAHD explore additional mitigation measures (please see Master Response 1: Feasible Mitigation – Guidance and Applicability, for information on the feasibility of mitigation). The Draft EIS/EIR adequately and in great detail addressed the existing conditions, existing regulations, project impacts and feasible mitigation measures associated with the air quality impacts and to minority populations and/or low-income populations resulting from the proposed Project (refer to Section 3.2, Air Quality and Meteorology, and Chapter 5, Environmental Justice, of the Draft EIS/EIR). In addition, the LAHD has an extensive public outreach program associated with activities at the Port, particularly related to air quality and greenhouse gas emissions, and implementation of mitigation as recommended by the commenter. Please also see Master Response 3: Port-wide Emission Reduction Programs for a general review of the various measures and programs implemented at the Port by LAHD to reduce emissions for Port operations. The comment does not identify any specific deficiencies or contest the adequacy of the Draft EIS/EIR; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

Response to Comment USEPA-2

The comment is noted. A copy of the Final EIS/EIR will be provided as requested.

Response to Comment USEPA-3

The USEPA rating and comment is noted and will be before the decision-makers for their consideration prior to taking any action on the proposed Project.

Response to Comment USEPA-4

The commenter notes the project would have significant and unavoidable air quality impacts and that construction emissions exceed the federal *de minimis* levels in 2018. Note that the SCAQMD has indicated that the construction emissions from the project's Federal Action have been included in the General Conformity set-aside in the Final 2012 Air Quality Management Plan, which is the currently approved SIP. The SCAQMD also confirmed that "…the project will conform to the SIP and is not expected to result in any new or additional violations of the NAAQS or impede the projected attainment of the standards" (Letter from Dr. Philip M. Fine, SCAQMD to Mr. Chris Cannon, Port of Los Angeles, August 24, 2016). Therefore, these emissions do not cause or contribute to a new violation of an ambient air quality standard, nor do they increase the frequency or severity of any existing violation of any standard. The Draft General Conformity Determination, which contains the SCAQMD letter on Attachment C, was included in Appendix B4 of the Draft EIS/EIR.

The commenter suggests several mitigation measures to further reduce air emissions, and includes a footnote (fn 1) opining that exemptions should be allowed "only if: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available." This latter recommendation is already incorporated into the applicable mitigation measures as detailed in the Mitigation Monitoring and Report Program for the proposed Project. Several of the construction mitigation measures, for example, (MM AQ-1, MM AQ-2, and MM AQ-3) allow exemptions

if it can be demonstrated that the required equipment is unavailable, to the satisfaction of LAHD. As it applies to implementing these measures, the exemption means that the equipment is not commercially available in California, incentive funds for the equipment upgrades have been applied for but not yet approved (or approved but not yet available), and/or the required equipment/control device is on order but not yet completed by the dealer or manufacturer. The first recommendation made by the commenter in fn. 1 (to allow the exemption only if equipment is not available from within the entire U.S., rather than within the state of California) is not feasible because a piece of specialized equipment, if geographically located far from the Port, for example, would likely not be able to be acquired in a reasonable and timely manner and is therefore too broad of a proposed requirement. Such a requirement could also require acquisition and use of equipment that is not yet commercially available and, hypothetically, could be located far from Los Angeles – such as on the east coast; thus, requiring long distance transport and the direct and indirect air emissions associated with such transport. Under this scenario, a requirement to acquire as yet unidentified "specialized equipment" would not necessarily result in avoiding or substantially lessening the significant impacts of the Project. More importantly, California already has a large equipment pool and a progressive regulatory framework targeting the reduction of air emissions and mandatory use of engines and/or equipment that in many instances is more stringent than other states and the federal government. Therefore, the Port believes that the existing exceptions within the applicable mitigation measures ensure the feasibility of such measures, and represent an adequate and reasonable approach to mitigating impacts to air quality while maintaining flexibility to address potential equipment availability shortcomings.

The commenter recommends requiring on-highway vehicles servicing the Everport Container Terminal to meet or exceed USEPA 2010 heavy-duty on-highway compression-ignition engine standards. This requirement is already incorporated into mitigation measure MM AQ-2 in the Draft EIS/EIR (page 3.2-32). In addition, the Clean Truck Program has banned trucks that do not meet the USEPA 2007 engine standards, with approximately 45 percent already meeting the 2010 standards. The reduced emissions associated with the Clean Truck Program are incorporated into both unmitigated and mitigate Project emissions. The Port continues to investigate updates to the Clean Air Action Plan (CAAP) that will reduce truck emission, as stated in the Draft 2017 Clean Air Action Plan Update (LAHD, 2017; https://www.portoflosangeles.org/pdf/CAAP_2017_Draft_Document-Final.pdf, accessed August 11, 2017). The program outlined in the Draft CAAP update for drayage trucks provides an additional path to substantially reduce truck emissions from Port operations over time. However, since the 2017 CAAP Update has not been formally adopted and the 2017 CAAP Update is a Port-wide program, LAHD is not taking any credit for the CAAP-estimated emission improvements in the proposed Project's EIS/EIR nor imposing on this Project a mitigation measure that cannot now be implemented Port-wide.

The commenter recommends that marine vessels, including all dredging equipment, to meet or exceed the Tier 4 marine CI engine standards for Category 1 & 2 vessels, and Tier 3 standards for Category 3 vessels. With regard to dredging equipment, LAHD has added to mitigation measure MM AQ-5 a requirement that, subject to availability, all dredging equipment shall be electric (see Chapter 3 of this Final EIS/EIR). LAHD requires the use of Tier 3 engines in harbor craft (usually Category 1 or 2 vessels) used in construction (MM AQ-1) and in operations per the currently approved CAAP, as noted in the Draft EIS/EIR, Section 3.2, Table 3.2-21 (pages 3.2-56 and 57). These requirements were incorporated into the unmitigated and mitigated emission inventories developed in the Draft EIS/EIR. Any requirements for Tier 4 engines in harbor craft will coincide the federal or state regulations and availability of Tier 4 harbor craft, and will be applied Port-wide. The incorporation of Category 3 Tier 3 vessels was included in both mitigated and unmitigated scenarios, based on forecasts provided by LAHD (Starcrest, 2015). Also see Chapter 3 of this Final EIS/EIR regarding changes to emissions tables in Section 3.2 of the Draft EIS/EIR. As stated on page B1-3 of Appendix B1 of the Draft EIS/EIR, these emission standards are assumed to apply to all harbor craft, but not oceangoing vessels, since it is likely that oceangoing vessels would be manufactured overseas and, therefore, would not be subject to the rule.

The recommendation to require all locomotives servicing Evergreen Container Terminal to exceed the San Pedro Bay Ports 2010 CAAP Update requirement of full compliance with USEPA Tier 4 locomotive emissions is not feasible because LAHD is pre-empted by the federal Surface Transportation Board from requiring/mandating certain types of locomotives operate at the Port.

With regard to requiring that all cargo handling equipment (CHE) be zero-emission equipment by 2030, see Master Response 2: Zero-Emissions Technologies for details regarding zero- and near-zero- emissions Cargo-Handling Equipment. As noted in the Draft 2017 CAAP Update, LAHD will work with CARB to facilitate technology demonstrations. As noted above, any such requirements would be implemented Port-wide and not as a mitigation measure for a single terminal project.

Regarding minimum performance requirements of mitigation measures MM AQ-2 and MM AQ-3, the assumptions used to calculate emissions were conservative in that for MM AQ-2 it assumes that 50 percent of on-road trucks used in construction will meet the USEPA 2010 on-road emission standards. The remaining 50 percent were assumed to meet the default EMFAC2014 fleet average for the given year. See Response to Comment SCAQMD-12 for revisions to MM AQ-2. For mitigation measure MM AQ-3, the assumptions were that 50 percent of non-road construction equipment will meet the USEPA Tier 4 final emission standards, 45 percent will meet USEPA Tier 3 standards, with additional control of particulate matter using Level 3 CARB-verified VDECS, and 5 percent will meet USEPA Tier 2 standards, with additional control of particulate matter using Level 3 CARB-verified VDECS. See Comment SCAQMD-12 for revisions to MM AQ-3.

LAHD has determined that all feasible mitigation measures have been incorporated at this time. Compliance with the 2017 CAAP Update will be implemented on a Port-wide basis, not project by project to avoid imposing a competitive disadvantage to one terminal over the others. In addition, please see Master Response 3: Port-wide Emission Reduction Programs, for a general review of the various measures and programs implemented at the Port by LAHD to reduce emissions from Port operations.

Table 3.2-1 in the Draft EIS/EIR (page 3.2-7) contains sufficient detail to inform readers of the potential effects of exposure to the criteria air pollutants, per NEPA and CEQA standards (State CEQA Guidelines Section 15151 and 40 CFR 1502.2, 1502.24).

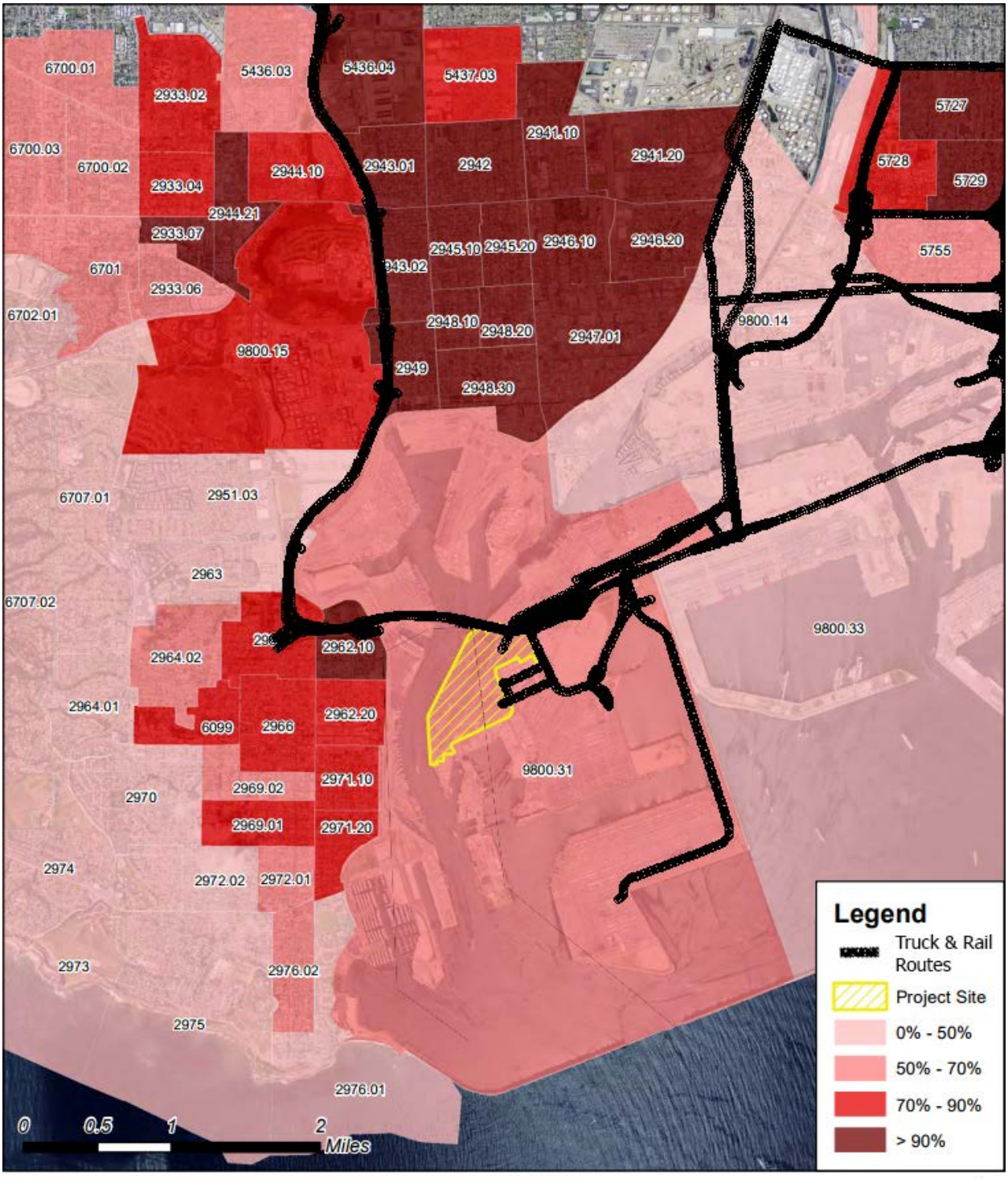
Response to Comment USEPA-5

The comment is noted. All feasible project-level mitigation measures have been applied to reduce any high and adverse impact to adjacent communities. Although Chapter 5, Environmental Justice, specifically addresses any disproportionate effects on minority and/or low-income populations associated with the proposed Project and alternatives, Section 4.2.2 of Chapter 4, Cumulative Analysis of the Draft EIS/EIR, details the cumulative impacts related to air quality and health risks associated with the proposed Project along with current or reasonably foreseeable future projects (approved or proposed). Therefore, the proposed Project/action was considered cumulatively with other proposed projects within the Ports of Los Angeles and Long Beach. The comment does not identify any specific deficiencies or contest the adequacy of the Draft EIS/EIR; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

Response to Comment USEPA-6

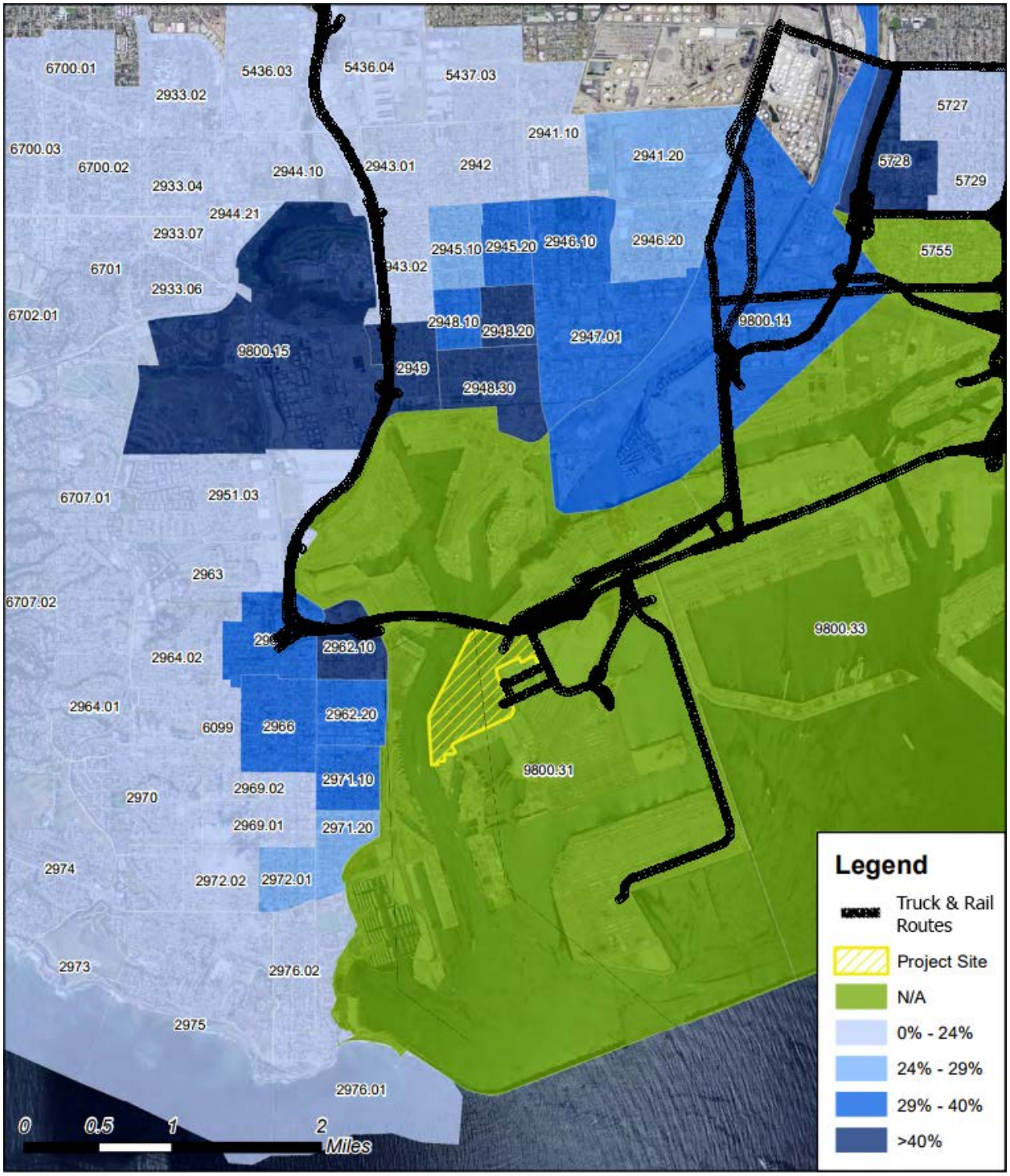
The comment is noted. Communities develop over time around major highways. Truck travel associated with Port activities uses the major highways wherever they are situated. Truck routes used during construction are discussed in Section 3.6.4.3 (page 3.6-53) of the Draft EIS/EIR. For the commenter's convenience, the following graphics overlay Figures 5-1 and 5-2 from the Draft EIS/EIR with potential,

assumed truck routes during project operation. While it is unknown the exact route any individual truck may take, as can be seen truck routes likely would be situated in a manner that minimizes impacts to communities, including minority and low-income housing, thus minimizing potential impacts associated with operational truck trips.



Source: U.S. Census Bureau, 2009-2013

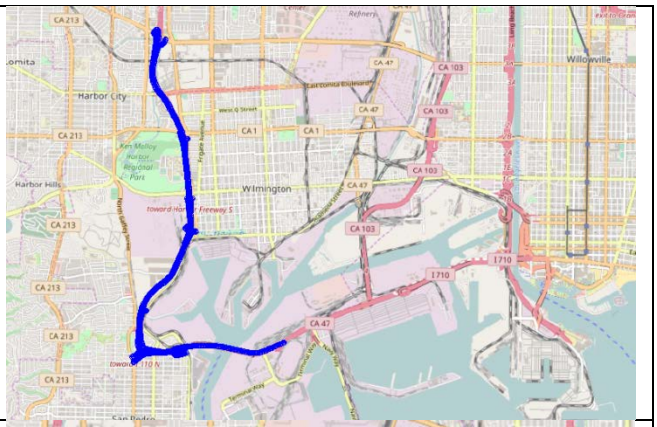
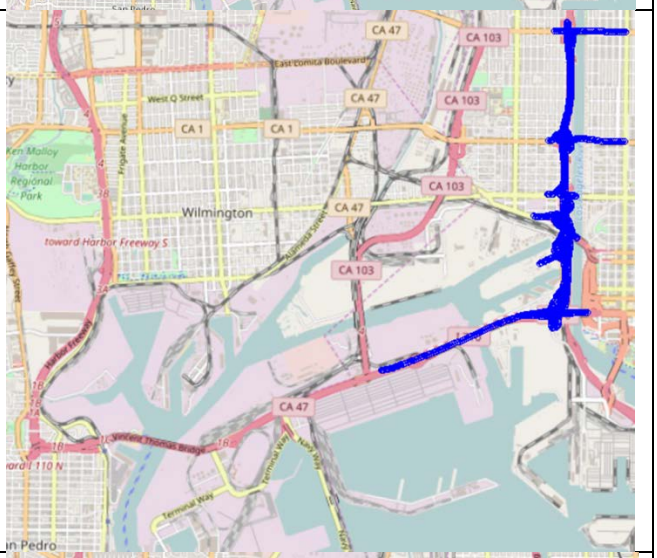
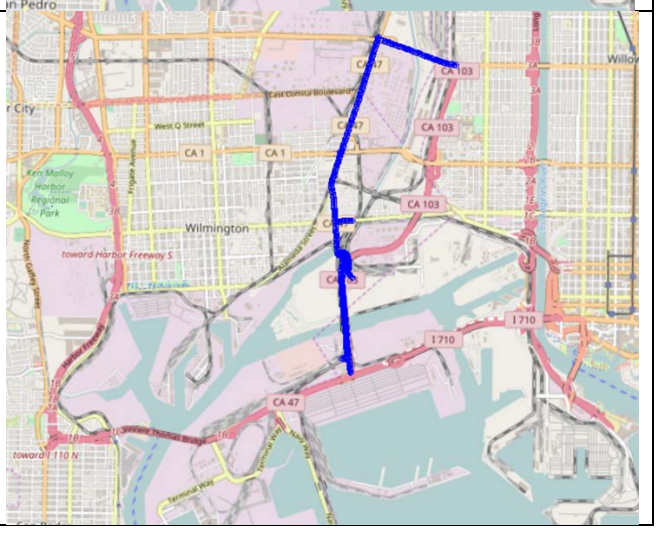
Figure 5-1: Percent of Minority Population (by Census Tract)



Source: U.S. Census Bureau, 2009-2013

Figure 5-2: Percent of Low-Income Population (by Census Tract)

Peak-daily truck trips are estimated by calculating the percent of truck-based traffic attributed to the Everport Container Terminal operations for year 2038 projected to use each of the routes shown below (see Appendix E1 of the Draft EIS/EIR).

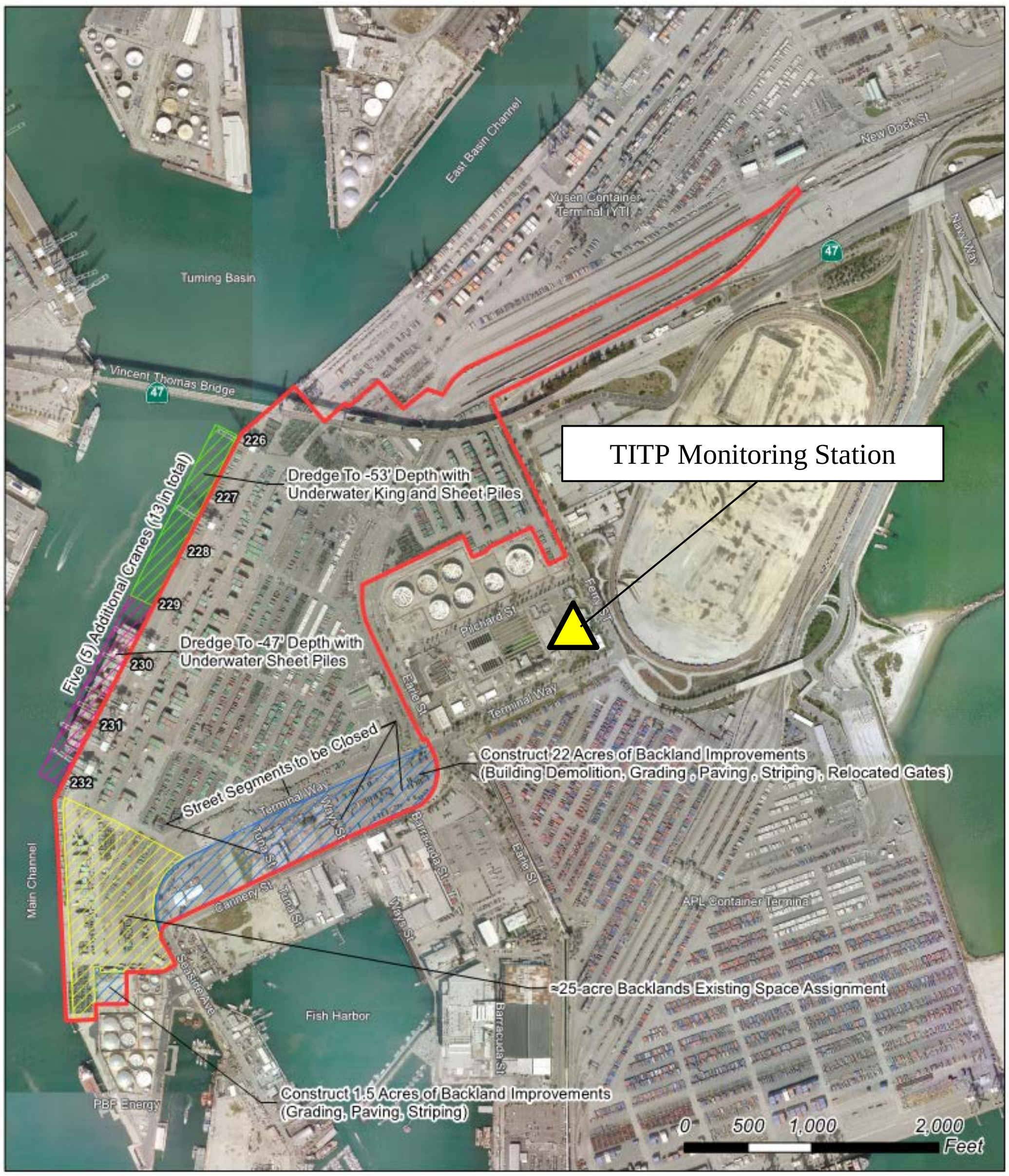
West Truck Route Estimated 20 percent of Peak-Day Truck Trips ~ 1,406 Trips	
East Truck Route Estimated 69 percent of Peak-Day Truck Trips ~ 4,849 Trips	
North Truck Route Estimated 11 percent of Peak-Day Truck Trips ~ 773 Trips	

Response to Comment USEPA-7

For information regarding estimated truck trip numbers by potential, assumed route, see Response to Comment USEPA-6.

Air quality monitoring is conducted at four locations in and around the Port of Los Angeles, including two community monitoring stations, one in San Pedro and one in Wilmington (see Section 3.2.2.2, Criteria Pollutants and Air Monitoring Criteria Pollutants, in the Draft EIS/EIR, page 3.2-9). The air quality monitoring station at the Terminal Island Water Reclamation Plant (referred to as the 'source dominated site') provides the best characterization of Port source impacts on air quality, including impacts from container trucks traveling to and from the Everport, YTI and APL terminals because of its close proximity to the Project site, as shown in Figure USEPA-7-1 below. Therefore, additional monitoring stations are not likely to produce a better evaluation of Port impacts.

Figure USEPA-7-1 Location of TITP Monitoring Station Relative to Project Site



See Response to Comment USEPA-6 above, for a discussion on minimizing impacts on communities, including minority and low-income housing, associated with truck trips. The planting of shade trees along affected corridors, and installing air filtration systems in buildings that house or serve sensitive receptors along route, are not appropriate or feasible because the transportation corridors used by the proposed Project are regionally used and not specific to, or under the control of the Everport Container Terminal and/or proposed Project, and because regional housing is largely privately owned. In addition, in the absence of a Port-wide program requiring the proposed Project to add these types of mitigation measures, a competitive disadvantage would be placed on Everport, which would not be appropriate for inclusion in, or the ability to implement through, the Draft EIS/EIR (State CEQA Guidelines Section 15126.4(a)(1); 40 CFR 1502.14(f)). However, mitigation for potential air quality impacts can be found in Section 3.2.4 of the Draft EIS/EIR, which includes seven mitigation measures and two lease measures to reduce impacts to air quality during construction and operation from sources that operate on regional roadways, railways, and shipping lanes, as well as on Port property.

The recommendation to establish a more rigorous timeframe for implementation of a zero- and near-zero-emission preferential access system is infeasible because a successful preferential access system cannot be appropriately evaluated until construction finishes in 2019 and port traffic analyses are updated; therefore, it is not appropriate for inclusion in the Draft EIS/EIR (State CEQA Guidelines Section 15126.4(a)(1); 40 CFR 1502.14(f)). Also, please see Master Response 2: Zero-Emission Technologies.

Response to Comment USEPA-8

The U.S. Department of Transportation (USDOT) is currently testing the Freight Advanced Traveler Information System (FRATIS) in the Ports of Los Angeles/Long Beach. FRATIS is currently only in development and therefore not available for inclusion with the proposed Project. At the commenter's request, information pertaining to FRATIS is included below.

FRATIS is designed to improve the efficiency of drayage and container handling by using several levels of real-time information to guide adaptive and effective decision making for drayage companies and drivers. The FRATIS demonstration project is focused on: (1) improving communications and sharing intermodal logistics information between the drayage industry and port terminals to reduce congestion during peak hours; and (2) improving traveler information so that drayage operators can more effectively plan around traffic and port congestion. The FRATIS system is not currently designed to increase dual transactions in container terminals. Some of the information provided via the system could potentially be used to indirectly facilitate increased dual transactions.

The primary objectives of FRATIS are:

- Reduce truck-miles traveled
- Reduce truck-hours travelled via reduced truck-miles travelled, reduced roadway travel times, and reduced container terminal visit times
- Reduce emissions and fuel consumption as co-benefits

These objectives are achieved via the following functions of FRATIS:

- Optimize routing and sequencing of truck missions (delivery or pick-up of containers) to/from the Ports of Los Angles and Long Beach, via pre-planning and real-time optimization during these missions

  - Using real-time traffic data from the Los Angeles County Metropolitan Transportation Authority (LA Metro) for freeways and roadways throughout southern California
  - Container terminal turn times
- Automate messaging by truck dispatchers to terminals of estimated arrival times

The USDOT previously tested FRATIS with 50 trucks at one terminal in the Port (USDOT, 2016). The current USDOT demonstration phase involves 200 trucks with several trucking companies. This current phase has commenced and will end in early 2018, but does not include a terminal operator. Estimated time of arrival of the trucks at the terminal is being disseminated via a website available to all terminal operators. Hence, terminal operators can "pull" ETA if they so desire.

Additionally, the USDOT project, the Port and the California Energy Commission (CEC) will be conducting a one-year pilot project that entails the expansion and enhancement of FRATIS. The Port of Los Angeles-CEC project, termed Eco-FRATIS, entails demonstrating ITS technology with 100 drayage trucks (in addition to 200 in the USDOT demonstration). The field-testing portion of the Port of Los Angeles-CEC project will commence in late 2017. In addition to the technologies and functions listed above, Eco-FRATIS will also include:

- Enhanced real-time container terminal visit times (in-terminal turn and gate queue times) via an automated mobile smart device application (Harbor Trucking Association/InfoMagnus Geostamp)
- University of California Riverside's ECO-Drive application, which entails using traffic signal timing information to optimize acceleration/deceleration of trucks (UCR, Center for Environmental Research and Technology, 2017)

Response to Comment USEPA-9

The comment is noted. The comment does not identify any specific deficiencies or contest the adequacy of the Draft EIS/EIR; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

Response to Comment USEPA-10

LAHD is committed to addressing the overall off-Port impacts created by Port operations on surrounding communities and their residents. The Harbor Community Benefit Foundation (HCBF) is a nonprofit organization that administers the Port Community Mitigation Trust Fund (PCMTF). The PCMTF was established following a Memorandum of Understanding (MOU) between appellants and the City of Los Angeles to settle appeals to the Board of Harbor Commissioner's certification of the Berths 136–147 [TraPac] Container Terminal Project Final EIS/EIR. The TraPac MOU was executed on April 2, 2008. Pursuant to Exhibit B of the TraPac MOU, a specific list of Port expansion projects was established for which LAHD would contribute to the PCMTF if implementation of the project occurs within the coverage dates of the MOU. Any EIR not certified by May 2016 falls outside of the effective coverage date of the MOU and is not required under the MOU to make a contribution to the PCMTF. Because the MOU is no longer in effect, there is no legal implementing mechanism for LAHD to make a contribution to this fund at this time. Although LAHD will not be contributing to the HCBF as a result of this project, it is important to note that LAHD contributes 10 percent of its operating income annually in local public infrastructure improvement projects. This amount of money equates to approximately $22-$25 million per year. In addition, LAHD contributes approximately $20 million additionally on an annual basis to public programs and public access projects. Further, the applicant will be contributing to the GHG Fund and this contribution will be increasing to approximately $300,000. The TraPac MOU does not allow the funding to be used as mitigation for direct project effects. Rather, the HCBF awards grants to a variety of projects and

programs aimed at reducing health, environmental, and community impacts from overall Port operations in the communities of San Pedro and Wilmington. Further information about the HCBF can be obtained from http://hcbf.org/.

Appendix A, Notice of Intent/Notice of Preparation, of the Draft EIS/EIR contains comment letters received in response to the NOI/NOP, which were considered throughout document preparation of the Draft EIR/EIS. Table 1-4 in Chapter 1 of the Draft EIS/EIR contains a summary of the comments received in response to the NOI/NOP. This Response to Comments chapter contains comment letters from community members as well as a transcript of the public hearing conducted for the Draft EIS/EIR; all of which have been responded to here per CEQA and NEPA requirements (PRC 21091(d); State CEQA Guidelines Section 15088; 40 CFR 1503.4 (a)(5)). The HCBF is tasked with administering the PCMTF and organizes "special events and ongoing community programs," such as "educational boat tours, summer concerts, parades, festivals, and outdoor movies" (Draft EIS/EIR, page 7-28). Refer to Chapters 5 and 7 of the Draft EIS/EIR for discussions on environmental justice and socioeconomic conditions, respectively, within the community and region.

Response to Comment USEPA-11

LAHD is currently working the Caltrans regarding the re-striping of this intersection to reduce the impacts in the 2026 study year and beyond. However, since no formal agreement has been reached at this time, this impact will remain significant and unavoidable. The Port has insufficient legal authority to enact transportation system improvements that are not under its jurisdiction and, therefore, per 2011 CEQ guidance on Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact, cannot "commit to mitigation measures" that they cannot perform or ensure the performance of (page 6). Also see State CEQA Guidelines Section 15126.4(a)(2) and (5) for CEQA criteria regarding legally binding mitigation. Every attempt will be made to formalize this agreement and there is no traffic impact triggered at this intersection until 2026 so it is LAHD's hope that this issue will be resolved by then and that this measure will be implemented.

Response to Comment USEPA-12

The comment is noted. The feasibility of the photovoltaic (solar) panels over the employee parking lot would depend on the project's approval and ultimate design. Feasibility cannot be determined at this time as detailed layout and engineering plans associated with the modified gate complex, which is a component of the proposed Project and Alternatives 1, 3 and 5, has not been completed. The detailed layout, which may involve reconfiguring and/or relocating the parking lot, will influence the feasibility of installing solar panels. As stated in mitigation measure MM GHG-2 on page 3.5-33 of the Draft EIS/EIR, if the feasibility study finds the solar parking structure to be feasible, it will be installed.

Response to Comment USEPA-13

The comment is noted. Approval from USEPA is required for disposal of dredge material at LA-2. Appendix F of the Draft EIS/EIR (on page 3) discusses the USEPA's regulatory and permit authority for ocean disposal actions pursuant to Sections 102 and 103 of the Marine Protection, Research, and Sanctuaries Act (MPRSA) of 1972. Further, the USACE is aware of requirements to obtain USEPA approval for disposal at LA-2 prior to issuing a DA permit.

Regarding impacts to human health and the marine environment associated with disposal of dredge material at LA-2, the discussion in Section 3.3.4.3 (under Impact BIO-1) in the Draft EIS/EIR determined, based on the sediment testing, that impacts to biological resources, including marine environment, would not be significant. To clarify this in the Evaluation of Dredged Material Disposal Options document (Appendix F2

of the Draft EIS/EIR), the assessment under the heading "Impacts of Ocean Disposal" beginning on page 10 of Appendix F2 has been supplemented (see Chapter 3 of this Final EIS/EIR) to indicate that anticipated impacts to the marine environment associated with disposal of dredge materials at LA-2 would not be significant. Based on the revised Appendix F2 assessment, significant impacts to human health and the marine environment are not anticipated. In addition, because there are no sensitive receptors near LA-2, there are no adverse air-pollution related human health impacts associated with disposal at this site. It should also be noted that as discussed in the Draft EIS/EIR, the environmental effects associated with disposal of dredged sediments at LA-2 were evaluated during the site designation process (USEPA, 1988) and subsequently evaluated in consideration of higher maximum annual disposal volume (USEPA and USACE, 2005). By meeting the sediment testing and disposal parameters established for LA-2, the disposal of project-related dredge material would have no additional direct, indirect, or cumulative adverse impact on the human or aquatic environment.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008

In Reply Refer To:
FWS-LA-17B0406-17I0904

June 5, 2017
Sent by Email

Aaron O. Allen, Ph.D.
North Coast Branch Regulatory Division
U.S. Army Corps of Engineers, Los Angeles District
Ventura Field Office
2151 Alessandro Drive, Suite 110
Ventura, California 93001

Attention: Theresa Stevens, Ph.D., Project Manager

Subject: Informal Section 7 Consultation for the Berths 226-236 Everport Container Terminal Improvements Project, Port of Los Angeles, Los Angeles County, California

Dear Dr. Allen:

This letter is in response to your April 21, 2017, request for informal consultation pursuant to section 7 of the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*) for the proposed Berths 226-236 Everport Container Terminal Improvements Project in the Port of Los Angeles (Port), Los Angeles County, California. You have requested our concurrence that the proposed project is not likely to adversely affect the federally endangered California least tern [*Sternula antillarum browni* (*Sterna a. b.*); least tern]. This consultation is based on information provided with your request and the Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) for the project dated April 2017.

USFWS-1

The proposed project will improve the container-handling efficiency and capacity of the Port to accommodate larger container vessel needs projected through 2038. The project includes dredging a total of 38,000 cubic yards of sediment to increase the depth at Berths 226-229 to -55 feet mean lower low water (MLLW) and the depth at Berths 230-232 to -49 feet MLLW. Dredge materials will be disposed at an ocean disposal site (i.e., LA-2) and/or an upland disposal facility. Sheet piles and/or king piles will be installed below the mud line to stabilize the existing wharves over a total distance of approximately 2,800 feet. The number of operational cranes will be increased from 8 to 13, and up to 5 existing cranes will be modified to accommodate larger vessels. A total of 23.5 acres of new backlands and associated infrastructure will be developed, for a total terminal acreage of 229 acres. Vessel traffic is projected to increase by 42 ship calls annually by 2038. Construction will be initiated at the end of 2017 and will be completed in approximately 24 months. A detailed project description is included in the EIS/EIR.

The proposed project is located about 2.5 miles from a least tern nesting site maintained by the Los Angeles Harbor Department (LAHD) on Pier 400. Potential effects to least terns from the proposed project include: (1) reduced foraging success as a result of construction-related disturbance and increased turbidity levels, (2) reduced foraging success due to increased vessel traffic and operation-related disturbances, and (3) increased potential for predation due to an increase in the number of high perches available for avian predators, such as peregrine falcons (*Falco peregrinus*).

Noise and disturbance associated with installation of the wharf stabilization structures and backland improvements could discourage least terns from foraging in the vicinity of the project site. According to the Draft EIS/EIR, sound pressure waves associated with pile driving could cause fish mortality (i.e., where noise levels are greater than 183 decibels) and are expected to cause fish to leave the project area. While foraging by least terns has been documented in the Inner Harbor where the project will occur, they prefer waters of the Outer Harbor that are closer to the nesting site. Turbidity from dredging is anticipated to be limited to about 1,000 feet from the project site (Draft EIS/EIR). Because impacts to foraging habitat will be limited to the Inner Harbor and several hundred acres of foraging habitat will be available for use by least terns in the Outer Harbor, we do not anticipate construction of the proposed project to impact least tern foraging success.

USFWS-1 cont.

Operation of the proposed project will increase the number of cranes by 5 and associated vessel traffic by 42 ships per year by 2038. Information provided with your request suggests that the operation of 5 additional cranes will not measurably alter the environmental conditions at the Everport Container Terminal. We currently do not have sufficient information to evaluate the individual or cumulative effects of increased vessel traffic and associated activities within San Pedro Bay on least tern foraging. Presumably, Port activities have been steadily increasing over time and have not resulted in a commensurate reduction in the productivity of least terns at Pier 400 (Draft EIS/EIR); however, human disturbances associated with aircraft and personnel watercraft have been identified as potential factors leading to reduced nesting and foraging success in the Port (Langdon Biological 2017). The LAHD proposes to conduct a least tern foraging study in 2017 that will include observations of any disturbances that may affect foraging behavior. We anticipate this study will contribute to our knowledge of the types and extent of disturbances to least tern foraging that may occur within San Pedro Bay. In addition, we will continue to work directly with the LAHD to identify monitoring strategies that could assist in tracking the current and future extent of activities in the vicinity of least tern foraging and nesting habitat to help inform management of the Pier 400 nesting site over time.

Peregrine falcons are known predators on least terns at Pier 400 (e.g., Langdon Biological 2017). While the addition of 5 cranes to Everport Container Terminal could provide additional perching opportunities for avian predators, the terminal is over 2.5 miles from the least tern nest site and is not in a preferred foraging area for least terns. Therefore, the additional cranes are not anticipated to increase the risk of predation on least terns.

Based on the above analysis, we concur with your determination that the proposed project is not likely to adversely affect the least tern. With our concurrence, the interagency consultation

requirements of section 7 of the Act have been satisfied. Although our concurrence ends informal consultation, obligations under section 7 of the Act shall be reconsidered if (1) new information reveals effects of the agency action that may affect listed species or critical habitat in a manner or to an extent not previously considered, (2) this action is subsequently modified in a manner that was not considered in this assessment, or (3) a new species is listed or critical habitat designated that may be affected by the action. **USFWS-1 cont.**

With respect to (1) above, our conclusions are based on the availability of Outer Harbor foraging areas for least terns in San Pedro Bay during the construction of the proposed project. If other projects with the potential to impact Outer Harbor foraging areas are scheduled to occur concurrently with the proposed project, our office should be contacted to determine if reinitiation of consultation is warranted. We appreciate your coordination on the above project. If you have any questions regarding this letter, please contact Fish and Wildlife Biologist Christine Medak at 760-431-9440, extension 298.

Sincerely,

JONATHAN SNYDER

Digitally signed by JONATHAN SNYDER
Date: 2017.06.05 09:33:14 -07'00'

for Karen A. Goebel
Assistant Field Supervisor

cc:
Bryant Chesney, NOAA National Marine Fisheries Service
Loni Adams, California Department of Fish and Wildlife

LITERATURE CITED

[Langdon Biological] Langdon Biological Consulting. 2017. Monitoring report for the California least tern 2016 season, Pier 400 nesting site, Los Angeles Harbor, City of Los Angeles, Los Angeles County, California. Prepared for Los Angeles Harbor Department, San Pedro, California.

2.3.2.4 U.S. Department of Interior, Fish and Wildlife Service, Ecological Services (USFWS)

Response to Comment USFWS-1

Thank you for your concurrence that the proposed Project is not likely to adversely affect the federally-listed as endangered California least tern and that the interagency consultation requirements pursuant to Section 7 of the Endangered Species Act of 1973 have been satisfied. The proposed Project will not affect the availability of Outer Harbor foraging areas for least terns in San Pedro Bay during construction. No further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

2.3.3 State Government Comments

Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630

Matthew Rodriquez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

May 19, 2017

Dr. Theresa Stevens, Ph.D.
U.S. Army Corps of Engineers
Los Angeles District Regulatory Division
Ventura Field Office
2151 Alessandro Drive, Suite 110
Ventura, California 93001
theresa.stevens@usace.army.mil

Mr. Christopher Cannon, Director
Environmental Management Division
City of Los Angeles Harbor Department
P.O. Box 151
San Pedro, California 90731
cegacomments@portla.org

DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT AND DRAFT GENERAL CONFORMITY DETERMINATION (EIS/EIR) FOR THE BERTHS 226-236 [EVERPORT] CONTAINER TERMINAL IMPROVEMENTS PROJECT (SCH# 2014101050)

Dear Dr. Stevens and Mr. Cannon:

The Department of Toxic Substances Control (DTSC) has reviewed the subject document. The following project description is stated in the draft EIS/EIR: "The existing terminal consists of two operating berths, Berths 226-229 and Berths 230-232, with eight operational 100-foot gauge wharf gantry cranes. Physical improvements proposed at the Everport Container Terminal include dredging and installing sheet piles[1] and king piles[2] at Berths 226-229, dredging and installing sheet piles at Berths 230-232, installation of spacers between the wharf and existing wharf fenders to provide better clearance between the berthed vessels and the new king and sheet piles, adding five new 100-foot gauge wharf gantry cranes, modifying the wharf to install five additional AMP vaults near the water's edge, expanding the backlands to a 1.5-acre parcel at the southern end and a 22-acre parcel between Terminal Way and Cannery Street. The 1.5-acre parcel is vacant. As part of the backland development, existing structures within the 22-acre parcel would be demolished, and the streets vacated." **DTSC-1**

Based on the review of the EIS/EIR, DTSC has the following comments: **DTSC-1 cont.**

1. The EIS/EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be appropriate to identify any recognized environmental conditions.

2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction. **DTSC-2**

3. If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB). **DTSC-3**

4. The EIS/EIR states, "As part of the backland development, existing structures within the 22-acre parcel would be demolished, and the streets vacated." If planned activities include building modifications/demolitions, lead-based paints or products, mercury, and asbestos containing materials (ACMs) should be addressed in accordance with all applicable and relevant laws and regulations. In addition, evaluate whether polychlorinated biphenyls (PCBs) containing materials is present in onsite buildings and address as necessary to protect human health and the environment. **DTSC-4**

5. The EIS/EIR further states, "All dredged material would be disposed of at an approved site, such as U.S. Environmental Protection Agency (EPA)-approved Ocean Disposal Site LA-2 (LA-25 2), an approved upland facility, or a combination of the two." If the project site is contaminated, wastes should be managed and disposed of in accordance with all relevant and applicable laws and regulations. **DTSC-5**

6. The EIS/EIR states, "The 180 acres includes approximately 20 acres for use as a railyard (the Everport Container Terminal portion of the TICTF). Railroad easements and rail yards are commonly impacted due to spillage of chemicals, fuels, and lubricants, and use of pesticides and herbicides along the tracks for weed control. DTSC recommends assessment/investigation and/or cleanup as necessary to confirm that no residual contamination associated with rail operation is present onsite if this area was used for railroad in the past. **DTSC-6**

7. The project includes, "Addition of five alternative maritime power (AMP) vaults (throughout wharf area adjacent to Berths 226 to 232) and associated infrastructure (e.g., electrical conduit and wires);[1]." DTSC recommends evaluation, proper investigation and mitigation, if necessary, on onsite areas with current or historic PCB-containing transformers or electrical equipment. **DTSC-7**

8. Aerially deposited lead (ADL) is generally encountered in unpaved or formerly unpaved areas adjoining older roads, primarily as a result of deposition from historical vehicle emissions when gasoline contained lead. As the project site is located adjacent to Ocean Boulevard, Ferry Street, Terminal Way and Cannery Street, this issue should be addressed in accordance with all applicable and relevant laws and regulations. **DTSC-8**

9. The EIS/EIR states that several areas at the project site were remediated or currently under remediation. The EIS/EIR should provide the following information: **DTSC-9**

    a. Identify the name(s) of the regulatory agency(ies) approved /currently overseeing the remediation of specific areas of contamination and the current status of investigation/remediation.

    b. Past operations at each area and the detected contaminants.

    c. Indicate whether the discharges resulted in groundwater or surface contamination.

    d. DTSC is unable to evaluate whether vapor sampling and/or potential vapor intrusion risk was adequately addressed due to lack of relevant detailed information in the EIS/EIR.

10. Human and ecological risks for the future users associated with the residual contaminants left in place at the site should be evaluated/remediated in accordance with all applicable and relevant laws and regulations. This information should be included in the EIS/EIR. **DTSC-10**

11. If soil contamination is suspected or observed in the project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable and relevant laws and regulations. In addition, if the project proposes to import soil to backfill the excavated areas, proper evaluation and/or sampling should be conducted to make sure that the imported soil is free of contamination. **DTSC-11**

12. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIS/EIR should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight. **DTSC-12**

If you have any questions regarding this letter, please contact me at (714) 484-5380 or email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,

Johnson P. Abraham
Project Manager
Brownfields Restoration and School Evaluation Branch
Brownfields and Environmental Restoration Program – Cypress

kl/sh/ja

cc; See next page.

cc: Governor's Office of Planning and Research (via e-mail)
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
State.clearinghouse@opr.ca.gov

Mr. David M. Walsh, P.E.
Chief Harbor Engineer
Los Angeles Harbor Department
DWalsh@portla.org

Ms. Tara Tisopulos
c/o Environmental Management Division
Los Angeles Harbor Department
TTisopulos@portla.org

Mr. Guenther W. Moskat, Chief (via e-mail)
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
Guenther.Moskat@dtsc.ca.gov

Mr. Dave Kereazis (via e-mail)
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Mr. Shahir Haddad (via e-mail)
Supervising Engineer
Brownfields Restoration and School Evaluation Branch
Brownfields and Environmental Restoration Program – Cypress
Shahir.Haddad@dtsc.ca.gov

CEQA# 2014101050

2.3.3.1 California Department of Toxic Substances Control (DTSC)

Response to Comment DTSC-1

Thank you for your review of the Draft EIS/EIR. The comment is noted. Section 3.7.2, Groundwater and Soils of the Draft EIS/EIR, provides a detailed description of the existing groundwater and soil conditions associated with current and historic uses at the Project site, a summary of findings from previous soil and groundwater investigations, and a description of potential site contamination due to those current and prior uses. Figure 3.7-1 in Section 3.7 illustrates the areas of potential concern within the Project site. As detailed in Section 3.7.2, both backland expansion areas (22-acre and 1.5-acre sites) have been the subject of various investigations over the years; therefore, the condition and contents of the backlands expansion sites have been investigated and an additional Phase 1 investigation is not warranted. Further, as detailed in Section 3.7.2.5, an Environmental Data Resources (EDR) data base report was prepared for the proposed Project, which identified approximately 50 sites (multiple facility names at the same address are considered one site) in various environmental data bases within the search radius of 1/8 mile of the Project site.

Response to Comment DTSC-2

The comment is noted. As described in Section 3.7.4.1 of the Draft EIS/EIR, groundwater and surface soil impacts were evaluated with respect to several general parameters, including existing and potential groundwater quality and soil contaminants. These evaluations include the former Canner's Steam Company Plant site within the 22-acre backlands expansion area and the 1.5-acre backlands expansion area, which are subject to oversight by the Los Angeles Regional Water Quality Control Board (LARWQCB). The impact of the proposed Project and the alternatives on each of these parameters was evaluated assuming compliance with all regulatory controls. Specifically, the Draft EIS/EIR assumes that any contaminated soil and groundwater encountered during or prior to construction of the proposed Project would be characterized, handled, transported, remediated, and/or disposed of in accordance with the LAHD protocols and all applicable federal, state, and local regulations.

Response to Comment DTSC-3

The comment is noted. As described in Section 3.7.4.1 of the Draft EIS/EIR, an individual NPDES permit for stormwater discharges or coverage under the General Construction Activity Storm Water Permit would be obtained for the proposed Project or alternatives. Please refer to Section 3.11.3 (within Section 3.11, Water Quality, Sediments, and Oceanography) for information on the NPDES regulations.

Response to Comment DTSC-4

The comment is noted. Section 3.7.2.3 of the Draft EIS/EIR, provides a subsection (beginning on page 3.7-10) that details known asbestos, lead-based paint and other hazardous materials (such as PCB-containing light ballasts) associated with the former Canners Steam Plant. Section 3.7.3 (beginning on page 3.7-11) also provides a description of the applicable laws, regulations governing the demolition of structures with regard to the potential encountering of PCBs and ACMs. These applicable regulations would address any known or unknown contamination discovered during construction and are in place to protect human health and the environment.

Response to Comment DTSC-5

The comment is noted. As detailed in Section 3.11.2.3 (in Section 3.11, Water Quality and Oceanography beginning on page 3.11-14) a sediment characterization study was performed at Berths 226-232 to determine the suitability of the dredged sediments for a range of potential dredged material management

options (Ramboll Environ, 2015). Results from this evaluation are presented in Section 3.11.2.3. To summarize, the results indicated that the sediments were suitable for unconfined aquatic disposal. In addition, on August 26, 2015, members of the Los Angeles Regional Contaminated Sediments Task Force agreed with the results and determined that all sediments dredged during the proposed Project would be suitable for ocean disposal at LA-2. However, if contamination is found on the landside of the Project site during construction, as stated within Section 3.7.4.3 (beginning on page 3.7-21), under Impact GW-1, all contaminated groundwater and/or soil encountered would be characterized, handled, transported, remediated, or disposed of in accordance with all applicable federal, state, and local laws and regulations and in accordance with the regulatory lead agencies' (e.g., USEPA, DTSC, LARWQCB, and LACFD) requirements.

Response to Comment DTSC-6

The comment is noted. As analyzed in Section 3.7.4.3, under Impact GW-1 (beginning on page 3.7-40), Alternative 5 would include the installation of a new rail line at the TICTF. The new rail line would be installed between existing rails, and would involve pavement removal, excavation to approximately 3 feet below ground surface (bgs), soil compaction, placement of base, installation of rail ties and track, and repaving. Terminal Island has undergone extensive changes since the later 1800s, and a review of the historic topographic maps referenced in Section 3.7 Groundwater and Soils (EDR, 2016b) shows early development of rail lines on what is now the TICTF on Terminal Island. No contaminant spills or discoveries of pesticide contamination have been documented at the TICTF in the 2016 EDR report; however, some indications of potential contamination were identified near the periphery of the Everport portion of the TICTF. As a consequence, there is a potential to encounter contaminated soil during installation of the new rail line at the TICTF; however, groundwater will not be encountered due to the depth of the excavation. As with the proposed Project, any contaminated soil encountered during construction of Alternative 5 would be handled, transported, remediated, or disposed of in accordance with all applicable federal, state, and local laws and regulations and in accordance with the regulatory lead agencies' (e.g., USEPA, DTSC, LARWQCB, and LACFD) requirements. Further, any soil disturbance in TICTF requires a soil management plan by the LARWQCB. Therefore, with adherence to existing laws and regulations, exposure associated with prior uses, which would be deleterious to humans, based on regulatory standards established by the lead agency for the site, would be less than significant.

Response to Comment DTSC-7

The comment is noted. The five additional AMP vaults and associated infrastructure is proposed for the area within 100 feet of the wharf, and not within an area that would have historically used PCB-containing transformers or electrical equipment. In addition, there is no removal of any PCB-containing transformers or electrical equipment associated with the proposed Project.

Response to Comment DTSC-8

The comment is noted. The Project site is not located adjacent to Ocean Boulevard. The proposed Project is located on Terminal Island along Terminal Way and Cannery Street. The existing terminal is paved, but portions of the backland expansion areas are unpaved. However, because Terminal Island is isolated from the mainland and the local streets in the project vicinity have historically had low traffic volumes relative to the high-volume highways and freeways in the distant vicinity and mainland, aerially deposited lead is not expected to be substantially above background levels on Terminal Island. In addition, the majority of Port activities involve diesel fuels and not gasoline. Therefore, based on the relatively low traffic volumes in the vicinity of the Project site and the limited use of gasoline in the area, it is not anticipated that aerially deposited lead would be an issue during construction. However, soils that would require disposal may be subject to representative sampling and analysis for contaminants prior to disposal, as a standard requirement

for Port construction contractors and included as a permit condition issued to the applicant prior to construction and excavation. Any soil found to be contaminated would be managed and/or disposed of in accordance with all applicable laws and regulations.

Response to Comment DTSC-9

The comment is noted. Section 3.7.2, Groundwater and Soils of the Draft EIS/EIR, provides a detailed description of the existing groundwater and soil conditions associated with current and historic uses at the Project site, as well as a summary of findings from previous soil and groundwater investigations, and a description of potential site contamination due to those current and prior uses. As detailed in Section 3.7.2, both backland expansion areas (22-acre and 1.5-acre sites) have been the subject of investigations and reports, within which details on the contaminants found (soil and/or groundwater), agency(ies) involved, and current circumstances with regulators, is provided. Soil remediation was completed at the former Canner's Steam Company Plant site under oversight of LARWQCB and is currently undergoing groundwater monitoring activities. Parcel H (1.5-acre site) is part of the former ExxonMobil (now PBF) site under oversight of LARWQCB and is currently undergoing groundwater monitoring activities (Cleanup and Abatement Order No. 0333, Site ID NO. 2040087). As for vapor information, on page 3.7-12 of the Draft EIS/EIR, the ExxonMobil/PBF site includes a full-scale free hydrocarbon product recovery system and vapor extraction system which has been in operation since 1996. The system continues to remove free hydrocarbon product from the ExxonMobil/PBF site and nearby areas. Any further potential vapor intrusion would be managed in accordance with all applicable laws and regulations.

Response to Comment DTSC-10

The comment is noted. The future uses of the Project site would continue to be General/Bulk Cargo (Non Hazardous Industrial and Commercial) and zoned as [Q]M3-1 (which allows for heavy industrial uses). The site will be paved and thus potential exposure pathways to the residual contamination in soil and groundwater for future site usage would be incomplete and minimized. As noted in the Draft EIS/EIR, and above in Response to Comments DTSC-5 and DTSC-6, all contaminated groundwater and/or soil encountered during construction would be characterized, handled, transported, and disposed of in accordance with all applicable federal, state, and local laws and regulations and in accordance with the regulatory lead agencies' (e.g., USEPA, DTSC, LARWQCB, LACFD, and LAHD) requirements pertaining to site investigation, testing, and treatment, and adherence to a contamination contingency plan. If further evaluation or remediation is necessary during construction, the adherence to existing laws and regulations would be followed (as described and evaluated in the Draft EIS/EIR), and would ensure that significant human or ecological risks to future uses would not occur. Therefore, no additional information or analysis is required in the EIS/EIR.

Response to Comment DTSC-11

The comment is noted. As noted in the Draft EIS/EIR, and above in Response to Comments DTSC-5, DTSC-6, and DTSC-10, all contaminated groundwater and/or soil encountered during construction would be characterized, handled, transported, and disposed of in accordance with all applicable federal, state, and local laws and regulations and in accordance with the regulatory lead agencies' (e.g., USEPA, DTSC, LARWQCB, LACFD, and LAHD) requirements. Any soil import will adhere to LAHD's Environmental Guidance for Import Soil Requirements (June 2016). Therefore, no additional information or analysis is required in the EIS/EIR.

Response to Comment DTSC-12

Refer to Response to Comments DTSC-5, DTSC-6, DTSC-10, and DTSC-11 above.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
www.dot.ca.gov

Making Conservation a California Way of Life.

May 24, 2017

Mr. Christopher Cannon
City of Los Angeles Harbor Dept
Environmental Management Division
P.O. Box 151
Los Angeles, CA 90731

RE: Berths 226-236 [Everport] Container Terminal Improvements
Vic: LA-47 / PM: 0.325
GTS# 07-LA-2017-00859
SCH# 2014101050

Dear Mr. Cannon:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project involves construction and operation of terminal improvements within and adjacent to Everport Container Terminal, including: dredging at Berths 226-236; installing five new wharf cranes; backlands improvements on adjacent 23.5 acres; and wharf efficiency improvements to accommodate larger ships.

Please note the nearest State facility is State Route 47, Caltrans does not anticipate any adverse impacts on State Highway System as a result of this project. **DOT-1**

Any transportation of heavy construction equipment and/or materials requiring use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods. Also, storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Be mindful that the project needs to be designed to discharge clean run-off water.

If you have any questions or concerns regarding these comments, please contact project coordinator, Severin Martinez at (213) 897-0067 or severin.martinez@dot.ca.gov and refer to GTS# 07-LA-2017-00859.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

2.3.3.2 California Department of Transportation, Caltrans District 7 (DOT)

Response to Comment DOT-1

Thank you for your review of the Draft EIS/EIR. The comment is general and anticipates that the proposed Project would not have any adverse impacts on the State Highway System. The comment does not identify any specific deficiencies or contest the adequacy of the Draft EIS/EIR; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

Air Resources Board

Mary D. Nichols, Chair
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

Matthew Rodriquez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

June 5, 2017

Mr. Christopher Cannon, Director
City of Los Angeles Harbor Department
Environmental Management Division
P.O. Box 151
San Pedro, California 90731

Theresa Stevens, Ph.D.
U.S. Army Corps of Engineers
Los Angeles District
2151 Alessandro Drive, Suite 110
Ventura, California 93001

Dear Mr. Cannon and Dr. Stevens:

Thank you for providing the California Air Resources Board (CARB or Board) staff the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the City of Los Angeles Harbor Department (LAHD) and U.S. Army Corps of Engineers Everport Container Terminal (ECT) Improvements for Berths 226-236 (Project). We understand that the proposed Project would improve container handling efficiency, increase container capacity, and accommodate larger vessels at ECT.

California's 2016 Sustainable Freight Action Plan (State Plan) supports projects that seek to improve system efficiencies and port competitiveness. But the State Plan also highlights the need to reduce or eliminate the health impacts on communities disproportionately affected by freight operations and to accelerate the transition to zero and near-zero emission equipment powered by renewable energy sources, including supportive infrastructure. The efficiency, competitiveness, and environmental objectives of the State Plan are echoed in the San Pedro Bay Ports 2017 Clean Air Action Plan Discussion Draft. For the proposed Project to achieve these objectives, we recommend that LAHD strengthen the proposed mitigation measures and include additional measures to directly address the increase in locomotive, vessels, and truck throughput projected to account for the increases in harmful diesel particulate and nitrogen oxides (NOx) emissions. CARB-1

LAHD has been a worldwide leader in reducing harmful emissions from maritime and support operations, and would continue that role under the 2017 Clean Air Action Plan with strong support for zero and near-zero emission technologies. CARB commends LAHD for its collaborative efforts on Everport's Enhanced Cargo Demonstration Project. CARB is aware that ECT was awarded a grant from the California Energy Commission in late 2016 and recently took possession of a portion of the near-zero liquefied natural gas yard tractors and battery electric yard tractors. CARB-1 cont.

Project Description

The proposed Project site is located within the Port of Los Angeles. The existing site is a 205-acre area that includes 20.5 acre area associated with the existing on-dock railyard (Terminal Island Transfer Facility) and 25 acres of a backland area. The proposed Project includes adding 23.5 acres for development, adding new backlands, relocating the main gate, adding parking and amending the lease to include the new parcels and extend Everport's lease through 2038. Construction of the proposed Project will take approximately 24 months and includes improvements, such as dredging, adding wharf piles and spacers, raising and adding cranes, installing additional shorepower and associated infrastructure which will allow the terminal to accommodate up to 16,000 ton equivalent units (TEU) vessels.

Cargo containers at ECT are moved off-terminal by both rail and trucks. Operations at ECT are projected to increase from the current maximum capacity of 1,818,000 TEUs to a maximum projected capacity of 2,379,525 by 2038 (peaking in 2033), resulting in an increase projected throughput of 561,525 TEUs. CARB-2

Results of the DEIR

The DEIR shows that the largest sources of harmful PM2.5 and NOx emissions are ships and locomotives. However, the DEIR does not propose any new mitigation measures to minimize or eliminate the increases that directly affect nearby disadvantage communities. While ECT may have a lesser ability to effect change, the Evergreen Line and the Port can and must secure reductions in these ship and locomotive emissions. The operational and construction emission tables presented in Chapter 3, Section 3.2, include proposed Project emissions per day, with and without mitigation. In 2033, NOx emissions from the source category "ships: main propulsion engines" drop a surprising 53 percent "with mitigation". Given that LAHD has not proposed mitigation measures that would achieve reductions from ship main engines other than the existing Voluntary Speed Reduction Program (VSRP), LAHD should recalculate the emissions and revise the tables, accordingly. In addition, LAHD should CARB-3

revise all of the emission tables to include a break-down of the expected emission reductions attributable to each of the proposed mitigation measures and any additional mitigation measures. CARB-3 cont.

Construction of the proposed Project will result in significant and unavoidable impacts for NOx in 2018 and 2019, volatile organic compounds (VOCs) in 2019, and overlapping construction and operations impacts for NOx in 2019. For operations, the proposed Project results in significant and unavoidable impacts for carbon monoxide (CO) and VOCs in 2033 and 2038. Furthermore, the mitigated proposed Project results in significant and unavoidable, cumulative air quality and health impacts in the region and to the nearby community. Even where impacts will remain significant and unavoidable after mitigation, CEQA nevertheless requires that all feasible[1] mitigation measures be incorporated. (See Cal. Pub. Resources Code § 21081; 14 CCR § 15126.2(b).) CARB-4

General Recommendations

CARB finds that the DEIR needs improvement in clarity and requires further development and consideration of our comments below. Furthermore, given the increased emissions from future terminal operations and cumulative impacts, LAHD should aggressively deploy the lowest emission technologies possible. This deployment should include those technologies that are "capable of being accomplished in a successful manner within a reasonable period of time" (Public Resources Code §21061.1; California Code of Regulations, title 14, section 15364), such as zero and near-zero emission technologies that are expected early in the life of the project. With these technologies, CARB staff believes that the proposed Project's air quality, health, and greenhouse gas impacts can feasibly be further mitigated. To that end, CARB staff recommends that the Final EIR include the additional mitigation measures outlined below. CARB-5

In addition, the 2017 Clean Air Action Plan Discussion Draft identifies that reductions in emissions can be achieved by shifting to on-dock rail, where possible. Projected truck trips per day is estimated to increase by nearly 60 percent, therefore CARB recommends that LAHD evaluate options to expand the on-dock rail capacity at ECT. CARB-6

[1]For the purposes of CEQA, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. (California Code of Regulations, title 14, section 15364.)

Mitigation Measures

1) LAHD should add a mitigation measure that requires accelerating the turnover of older line-haul locomotives servicing ECT to ones meeting Tier 4 emission standards. By the proposed Project's interim year (2026), LAHD should require that all line-haul locomotives servicing Everport meet Tier 4 emission standards. To monitor the progress of this acceleration, include the distribution of engine tiers used in determining the locomotive emissions for the baseline year (2013) and the opening year (2019). Furthermore, CARB recommends that LAHD incentivize or require the use of cleaner locomotive technologies, through lease agreements, as rail use increases. This would include, but is not limited to, a hybrid-electric locomotive with all electric capability. CARB's Technology Assessment: Freight Locomotives provides information on projected development of cleaner freight locomotives. This assessment can be found at https://www.arb.ca.gov/msprog/tech/techreport/freight_locomotives_tech_report.pdf. CARB-7

2) Mitigation Measure (MM) AQ-7 requires an 85 percent shore power compliance rate by 2020 and 95 percent compliance by 2026. Recipients, such as the LAHD, of Proposition 1B funding for grid-based electric power at T227, must meet a 90 percent utilization rate by 2020. Furthermore, the proposed Project includes adding five alternative maritime power (AMP) terminal vaults. With these added AMP vaults and given the terminal operator owns the majority of the ships that will call at ECT's berths (specifically T227 and T230), it is reasonable that ten vaults are sufficient to achieve a 100 percent compliance rate. In March 2017, our Board directed staff to expand the at-berth regulation to achieve up to 100 percent compliance. In anticipation of CARB's regulatory amendments, LAHD should expand MM AQ-7 to require a 100 percent shore-power compliance rate from vessels equipped with shore power starting in 2020 and require alternative capture and control systems for all ships that are not equipped to use shore-based electricity. This includes all vessels subject to MM AQ-4. Currently, MM AQ-4 only requires ships and barges used to deliver construction-related materials to comply with the expanded Vessel Speed Reduction Program. All ocean-going vessels as part of the construction phase of the proposed Project should also be required to use alternative capture and control systems if they are not equipped to use shore-based electricity for the duration of their stay. Furthermore, LAHD should utilize mechanisms to incentivize or encourage the terminal operator to bring their cleanest ships to ECT. CARB-8

3) Given the projected increase in throughput of cargo containers at ETC, LAHD should require the use of cargo handling equipment (CHE), including yard trucks, handlers, gantry cranes, fork lifts, that includes technologies beyond those required by the mobile CHE regulation, and includes use of zero and near-zero emission technology as it becomes commercially available. CARB's Technology Assessment: Mobile Cargo Handling Equipment, provides information on current and projected development of CHE. This assessment can be found at https://www.arb.ca.gov/msprog/tech/techreport/che_tech_report.pdf. CARB-9

4) According to LAHD, the container throughput at ECT includes refrigerated shipping containers; however, the DEIR does not include information regarding this emission source or associated emissions. The LAHD should revise the DEIR to include refrigerated shipping containers as an emission source category, including their dwell times and mitigation that will eliminate or reduce these emissions. CARB recommends that the LAHD consider requirements that refrigerated shipping containers on rail cars be plugged in to a containerized hydrogen fuel cell generator carried on adjacent rail car or other available technology. ARB's Technology Assessment for Transport Refrigerators is available at https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf. CARB-10

5) MM AQ-1 requires that the harbor craft used for construction must be equipped with engines meeting the U.S. Environmental Protection Agency Tier 3 emission standards or cleaner at all times during construction. LAHD should expand this measure to require the use of the cleanest available commercial harbor craft (CHC) (LPG/LNG, biodiesel, electric hybrid) during operations. CARB's Technology Assessment: Commercial Harbor Craft, provides information on current and projected development of CHC, including current and anticipated costs at widespread development. This assessment can be found at https://www.arb.ca.gov/msprog/tech/techreport/draft_chc_technology_assessment.pdf. CARB-11

6) MM AQ-6 requires Evergreen vessels to comply with the expanded VSRP (12 knots at 40 nautical miles) by 95 percent. CARB recognizes that LAHD implements an incentive based, voluntary VSRP and based on the VSRP Operator Summary Report, Evergreen vessels met a 99 percent participation rate to 20 nautical miles and a 97 percent participation rate to 40 nautical miles in 2016. Since LAHD is already achieving projected emission reductions beyond what MM AQ-6 requires, there is no additional benefit. Therefore, LAHD should propose further mitigation to achieve reductions from vessels calling at ECT. CARB-12

7) Lease Measure AQ-1 requires tenants to meet with LAHD when a tenant needs to replace or turnover equipment to determine the availability and feasibility of cleaner equipment. Furthermore, the tenant is required to assess any new technology for feasibility and report back to LAHD every five years. Given the changing market conditions and advances in technology, LAHD should reduce the tenant's reporting and technology review requirements to every two years. CARB-13

8) LAHD should describe the type of dredging (i.e. mechanical, hydraulic, hybrid, etc.) and the expected emissions from this activity, as well as adding mitigation that requires using the cleanest available technology. CARB-14

9) Starting in 2033, off-dock truck traffic is projected to increase by 18 percent from the 2013 baseline. According to Table 3.2-20, truck emissions account for 40 percent of the total PM10, 17 percent of total PM2.5, and approximately six percent of the total emissions for NOx and CO in 2033. As technology becomes available, LAHD should require that medium-heavy and heavy-heavy duty trucks traveling within 100 miles of the terminal use zero and near-zero technology. CARB's Technology and Fuels Assessments provide information on the current and projected development of mobile source technologies and fuels, including current and anticipated costs at widespread deployment. The assessments can be found at http://www.arb.ca.gov/msprog/tech/tech.htm. CARB-15

Recommendations to Improve the Health Risk Analysis Discussion

1) Appendix B3, Section 4.3, Page B3 13; "Exposure Scenarios for Individual Cancer Risk", indicates that Project emissions spanning construction and operation of the proposed Project were averaged and applied chronologically to each age bin identified in the OEHHA Air Toxics Hot Spots Program, Risk Assessment Guidelines (2015). This approach can mask any peak emissions and the associated potential health impacts that may occur over the lifetime of the project. Therefore, LAHD should revise the DEIR to include an evaluation of the potential cancer risk starting when peak emissions occur (e.g. PM10 and PM2.5 appear to increase in 2033 according to tables 3.2-11 and 3.2-20). The reason for starting the risk analysis at these point(s) is because pregnancy, and the age bin encompassing birth through age two, can occur concurrently with the emissions peaks over the course of the construction and operation of the proposed project. Presenting the potential health impacts beginning at these points throughout the project will provide the public with a more comprehensive understanding of the project and how the potential health risk estimates may change as the project is completed and the facility changes to full operation. CARB-16

2) Appendix B3, Table B3-5; "Maximum CEQA Health Impacts Estimated for Construction and Operation of the Proposed Project Without Mitigation": LAHD should revise this table, and any other table presenting similar information, to more clearly present the potential cancer and noncancer health impacts from the proposed Project. In this table, it is difficult to understand the potential health impacts and where they occur for each receptor type (i.e., residential, occupational, and sensitive) and what the column headers (e.g., Proposed Project, CEQA Baseline, CEQA Increment, Future CEQA Baseline, and Future CEQA Increment) actually represent. For example, it is not clear in the table that the potential health impacts for the receptors under the column headers may occur at different locations. To address this, please add additional receptor description information (e.g., receptor index) to clarify the table. Furthermore, to better provide transparency and clarity to the public, LAHD should revise the text associated with these tables to fully explain any necessary information. CARB-17

Additional Comments

1) Appendix F2 provides an evaluation for the disposal of the dredged material, concluding that the only disposal option feasible and practical is 100 percent ocean disposal at LA-2 Facility, located 11 kilometers offshore from the entrance to LAHD. However, Tables 3.2-10A and Table 3.2-10B include both upland and ocean disposal and associated emissions. LAHD should revise these tables and include the emissions and assumptions associated with the ocean disposal option. CARB-18

2) Air Quality Emissions, Appendix B1 includes sweepers as part of the CHE emission inventory. Sweepers are no longer part of CARB's CHE regulation and should be removed. Sweepers are regulated under either CARB's Off-Road Regulation or the Statewide Truck and Bus Regulation, depending on the sweeper engine. LAHD should revise these emission inventories, appropriately. To determine which regulation applies to sweepers, please reference CARB's Enforcement Advisory Number 401, which can be found at https://www.arb.ca.gov/enf/advs/advs401.pdf. CARB-19

Closing

CARB recognizes the role the proposed Project can have in supporting a more efficient and economically competitive Port, but we urge you to augment the mitigation measures to ensure the community is not adversely impacted. We appreciate the opportunity to comment on the DEIR, and CARB is available to provide further assistance, as needed. CARB-20

Please include CARB on your State Clearinghouse list of selected State agencies that will receive the Final Environmental Impact Report as part of the comment period. CARB-21

If you have questions, please contact me at (916) 322-8277, or Robbie Morris, Air Pollution Specialist, at (916) 327-0006 or robbie.morris@arb.ca.gov.

Sincerely,

Richard Boyd

for Elizabeth Yura, Chief
Emissions Assessment Branch
Transportation and Toxics Division

cc: Louis Dominguez, Chair
Port and Environment Committee
Coastal San Pedro Neighborhood Council
1840 S Gaffey Street, Box 34
San Pedro, CA 90731

Connell Dunning
Transportation Team Supervisor
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street, ENF-4-2
San Francisco, California 94105

Jesse Marquez
Executive Director
Coalition for A Safe Environment
1601 N. Wilmington Boulevard, Suite B
Wilmington, California 90744

Continued next page.

cc: (continued)

David Pettit
Senior Attorney, Southern California Air Program
Natural Resources Defense Council
1314 Second Street
Santa Monica, California 90401

Jillian Wong
Planning and Rules Manager
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

2.3.3.3 California Air Resources Board (CARB)

Response to Comment CARB-1

Thank you for your review and comments on the Draft EIS/EIR. Please see Master Response 1: Feasible Mitigation – Guidance and Applicability, Master Response 2: Zero-Emission Technologies, Master Response 3: Port-wide Emission Reduction Programs, and the responses to specific comments below.

Response to Comment CARB-2

The comment is noted. The comment does not identify any specific deficiencies or contest the adequacy of the Draft EIS/EIR; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

Response to Comment CARB-3

The comment is noted. The comment notes that in 2033, peak daily NOx emissions from the source category "ships: main propulsion engines" with mitigation drops 53 percent compared to without mitigation despite an apparent lack of mitigation measures affecting this category. This reduction is due to an assumption that the peak daily emissions without mitigation would not include Tier 3 vessels, while peak daily emissions with mitigation would include Tier 3 vessels. The assumption that Tier 3 vessels would arrive by 2033 is based on a market analysis developed by Starcrest Consulting Group (Starcrest, 2015). For disclosure purposes, applying the phase-in of Tier 3 vessels to the unmitigated scenarios in 2026, 2033 and 2038 results in the Proposed Project peak daily operational emissions presented below. Additionally, the revised ship main propulsion engine NOx emissions in Alternatives 1 through 5 are summarized in Tables CARB-3-2 through CARB-3-5, below. Finally, the revisions summarized in the tables below have been incorporated into the Draft EIS/EIR, Tables 3.2-20, 3.2-35, 3.2-52, 3.2-69, and 3.2-86 as shown in Chapter 3 of this Final EIS/EIR. The results of these revisions are that incremental unmitigated operational emissions relative to the CEQA Baseline would be lower for NOx under the proposed Project and all alternatives and years, except for Alternative 1 in 2019.

Table CARB-3-1: Revised Unmitigated Peak Daily Operational Emissions for the Proposed Project

Year – Category	Unmitigated NOx (Without Tier 3)	Unmitigated NOx (Tier 3 Included)
2026 - Ships: Main Propulsion Engines	~~7,148~~	*6,293*
2026 - Total Operational Year 2026	~~11,777~~	*10,922*
2026 - Project Minus CEQA Baseline	~~-982~~	*-1,837*
2026 - Project Minus NEPA Baseline	~~3,255~~	*2,400*
2033 - Ships: Main Propulsion Engines	~~10,544~~	*5,862*
2033 - Total Operational Year 2033	~~16,869~~	*12,187*
2033 - Project Minus CEQA Baseline	~~4,110~~	*-572*
2033 CEQA - Significant?	~~**Yes**~~	*No*
2033 - Project Minus NEPA Baseline	~~9,140~~	*4,458*
2038 - Ships: Main Propulsion Engines	~~10,544~~	*3,541*
2038 - Total Operational Year 2038	~~15,862~~	*8,859*
2038 - Project Minus CEQA Baseline	~~3,103~~	*-3,900*
2038 CEQA - Significant?	~~**Yes**~~	*No*
2038 - Project Minus NEPA Baseline	~~11,338~~	*4,335*

Table CARB-3-2: Revised Unmitigated Peak Daily Operational Emissions for Alternatives 1 & 2

Year – Category	Unmitigated NOx (Without Tier 3)	Unmitigated NOx (Tier 3 Included)
2026 - Ships: Main Propulsion Engines	~~7,508~~	*6,326*
2026 - Total Operational Year 2026	~~11,357~~	*10,175*
2026 - Project Minus CEQA Baseline	~~-1,402~~	*-2,584*
2033 - Ships: Main Propulsion Engines	~~10,812~~	*5,139*
2033 - Total Operational Year 2033	~~15,975~~	*10,302*
2033 - Project Minus CEQA Baseline	~~3,216~~	*-2,457*
2033 CEQA - Significant?	~~Yes~~	*No*
2038 - Ships: Main Propulsion Engines	10,812	*2,302*
2038 - Total Operational Year 2038	~~15,327~~	*6,817*
2038 - Project Minus CEQA Baseline	~~2,569~~	*-5,941*
2038 CEQA - Significant?	~~Yes~~	*No*

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Table CARB-3-3: Revised Unmitigated Peak Daily Operational Emissions for Alternative 3

Year – Category	Unmitigated NOx (Without Tier 3)	Unmitigated NOx (Tier 3 Included)
2026 - Ships: Main Propulsion Engines	~~6,968~~	*5,782*
2026 - Total Operational Year 2026	~~11,186~~	*10,000*
2026 - Project Minus CEQA Baseline	~~-1,573~~	*-2,759*
2026 - Project Minus NEPA Baseline	~~2,664~~	*1,478*
2033 - Ships: Main Propulsion Engines	~~10,432~~	*5,330*
2033 - Total Operational Year 2033	~~16,448~~	*11,346*
2033 - Project Minus CEQA Baseline	~~3,689~~	*-1,413*
2033 CEQA - Significant?	~~Yes~~	*No*
2033 - Project Minus NEPA Baseline	~~8,719~~	*3,617*
2038 - Ships: Main Propulsion Engines	~~10,432~~	*3,038*
2038 - Total Operational Year 2038	~~15,530~~	*8,136*
2038 - Project Minus CEQA Baseline	~~2,772~~	*-4,622*
2038 CEQA - Significant?	~~Yes~~	*No*
2038 - Project Minus NEPA Baseline	~~11,006~~	*3,612*

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Table CARB-3-4: Revised Unmitigated Peak Daily Operational Emissions for Alternative 4

Year – Category	Unmitigated NOx (Without Tier 3)	Unmitigated NOx (Tier 3 Included)
2026 - Ships: Main Propulsion Engines	~~7,382~~	*6,192*
2026 - Total Operational Year 2026	~~11,193~~	*10,003*
2026 - Project Minus CEQA Baseline	~~-1,565~~	*-2,755*
2026 - Project Minus NEPA Baseline	~~2,671~~	*1,481*
2033 - Ships: Main Propulsion Engines	~~7,467~~	*3,842*
2033 - Total Operational Year 2033	~~13,651~~	*10,026*
2033 - Project Minus CEQA Baseline	~~893~~	*-2,732*
2033 CEQA - Significant?	~~Yes~~	*No*
2033 - Project Minus NEPA Baseline	~~5,922~~	*2,297*
2038 - Ships: Main Propulsion Engines	~~7,467~~	*2,406*
2038 - Total Operational Year 2038	~~12,823~~	*7,762*
2038 - Project Minus CEQA Baseline	~~65~~	*-4,996*

Table CARB-3-4: Revised Unmitigated Peak Daily Operational Emissions for Alternative 4

Year – Category	Unmitigated NOx (Without Tier 3)	Unmitigated NOx (Tier 3 Included)
2038 CEQA - Significant?	~~Yes~~	*No*
2038 - Project Minus NEPA Baseline	~~8,299~~	*3,238*

Table CARB-3-5: Revised Unmitigated Peak Daily Operational Emissions for Alternative 5

Year – Category	Unmitigated NOx (Without Tier 3)	Unmitigated NOx (Tier 3 Included)
2026 - Ships: Main Propulsion Engines	~~7,148~~	*6,293*
2026 - Total Operational Year 2026	~~11,777~~	*10,922*
2026 - Project Minus CEQA Baseline	~~-982~~	*-1,837*
2026 - Project Minus NEPA Baseline	~~3,255~~	*2,400*
2033 - Ships: Main Propulsion Engines	~~10,544~~	*5,862*
2033 - Total Operational Year 2033	~~16,867~~	*12,185*
2033 - Project Minus CEQA Baseline	~~4,109~~	*-573*
2033 CEQA - Significant?	~~Yes~~	*No*
2033 - Project Minus NEPA Baseline	~~9,138~~	*4,456*
2038 - Ships: Main Propulsion Engines	~~10,544~~	*3,541*
2038 - Total Operational Year 2038	~~15,856~~	*8,853*
2038 - Project Minus CEQA Baseline	~~3,097~~	*-3,906*
2038 CEQA - Significant?	~~Yes~~	*No*
2038 - Project Minus NEPA Baseline	~~11,332~~	*4,329*

A sensitivity analysis on the ship main propulsion engine contributions to the peak hourly NO2 concentrations indicated that the peak receptors were not substantially impacted by ship emissions (see Tables CARB 3-6 and CARB 3-7 for the results of this sensitivity analysis). The correction to the peak NO2 concentration would be a reduction, if the peak concentration reported in the Draft EIS/EIR occurred in 2026 or later. No change in the peak NO2 concentration would occur if the reported peak occurred in 2019, since no Tier 3 vessels are assumed to call on the terminal in 2019. This methodology was applied to all alternatives, years and NO2 averaging periods under CEQA and NEPA. This sensitivity analysis was applied to all alternatives and years 2026, 2033, and 2038. The results of these evaluations are summarized in Table CARB-3-6 for CEQA and Table CARB-3-7 for NEPA, which disclose the revised peak NO2 concentrations for unmitigated scenarios. No concentration related significance determinations presented in the Draft EIS/EIR were changed as a result of this analysis.

Table CARB-3-6: Revised Unmitigated Peak Operational 1-hour NO2 Ground-Level Concentrations (ppm) under CEQA

Scenario	Concentrations (Without Tier 3)	Reductions due to inclusion of Tier 3 OGV	Concentrations (Tier 3 Included)
Proposed Project. 1-hour NAAQS	0.119	N/A*	*Same as w/o Tier 3*
Proposed Project. 1-hour CAAQS	0.16	N/A*	*Same as w/o Tier 3*
Alternative 1. 1-hour NAAQS	0.117	N/A*	*Same as w/o Tier 3*
Alternative 1. 1-hour CAAQS	0.15	N/A*	*Same as w/o Tier 3*
No Project. 1-hour NAAQS	0.117	N/A*	*Same as w/o Tier 3*
No Project. 1-hour CAAQS	0.15	N/A*	*Same as w/o Tier 3*
Alternative 3. 1-hour NAAQS	0.117	N/A*	*Same as w/o Tier 3*

Table CARB-3-6: Revised Unmitigated Peak Operational 1-hour NO2 Ground-Level Concentrations (ppm) under CEQA

Scenario	Concentrations (Without Tier 3)	Reductions due to inclusion of Tier 3 OGV	Concentrations (Tier 3 Included)
Alternative 3. 1-hour CAAQS	0.15	N/A*	*Same as w/o Tier 3*
Alternative 4. 1-hour NAAQS	0.088	-0.0009	*0.087*
Alternative 4. 1-hour CAAQS	0.11	-0.0010	*0.11*
Alternative 5. 1-hour NAAQS	0.119	N/A*	*Same as w/o Tier 3*
Alternative 5. 1-hour CAAQS	0.16	N/A*	*Same as w/o Tier 3*

Notes.
N/A* - The year of peak operational concentrations is 2019, which does not include Tier 3 OGV assumptions.

Table CARB-3-7: Revised Unmitigated Peak Operational 1-hour NO2 Ground-Level Concentrations (ppm) under NEPA

Scenario	Concentrations (Without Tier 3)	Reductions due to inclusion of Tier 3 OGV	Concentrations (Tier 3 Included)
Proposed Project. 1-hour NAAQS	0.097	-0.0033	*0.094*
Proposed Project. 1-hour CAAQS	0.13	-0.0034	*0.13*
Alternative 3. 1-hour NAAQS	0.096	-0.0036	*0.092*
Alternative 3. 1-hour CAAQS	0.12	-0.0037	*0.12*
Alternative 4. 1-hour NAAQS	0.111	0.0006	*0.112*
Alternative 4. 1-hour CAAQS	0.14	N/A*	*Same as w/o Tier 3*
Alternative 5. 1-hour NAAQS	0.097	-0.0033	*0.094*
Alternative 5. 1-hour CAAQS	0.13	-0.0034	*0.13*

Notes.
N/A* - The year of peak operational concentrations is 2019, which does not include Tier 3 OGV assumptions.

The commenter also requested that all of the emissions tables be revised to include a breakdown of the expected emission reductions attributable to each proposed mitigation measure. Revisions to each impact table in the Draft EIS/EIR to include the breakdown of mitigated emissions for each source relative to each mitigation measure would cause the impact tables to be confusing due to the larger amount of information which would be presented. However, for the commenter's convenience, we have provided Table CARB-3-8 detailing the modeled impact of each mitigation measure on each source group throughout the project.

Table CARB-3-8: Effects of Mitigation Measures on Emissions Source Groups

Measure	Brief Description	Source Category	Peak Day Reduction	
MM AQ-1	Construction Harbor Craft must comply with USEPA Tier 3 engine standards or cleaner throughout construction.	Marine Source Exhaust	PM_{10}	50%
			$PM_{2.5}$	44%
			NO_X	19%
			SO_X	0%
			CO	0%
			VOC	14%
MM AQ-2	On-Road construction trucks must comply with USEPA 2010 on-road emission standards or cleaner throughout construction.	On-Road Construction Vehicles	PM_{10}	0%
			$PM_{2.5}$	0%
			NO_X	0%
			SO_X	0%
			CO	0%
			VOC	0%

Table CARB-3-8: Effects of Mitigation Measures on Emissions Source Groups

Measure	Brief Description	Source Category	Peak Day Reduction	
MM AQ-3	Non-Road construction equipment greater than 50 horsepower must comply with USEPA Tier 4 emission standards or cleaner throughout construction.	Off-road Construction Equipment Exhaust	PM_{10}	29%
			$PM_{2.5}$	29%
			NO_X	19%
			SO_X	0%
			CO	0%
			VOC	0%
MM AQ-4	Cargo Ships delivering primarily construction-related materials or cranes must comply with the expanded Vessel Speed Reduction Program (VSRP) or 12 knots between 40 nautical miles (nm) from Point Fermin and the Precautionary Area.	Marine Source Exhaust	PM_{10}	0%
			$PM_{2.5}$	0%
			NO_X	0%
			SO_X	0%
			CO	0%
			VOC	0%
MM AQ-5	For all previous mitigation measures, if better technology becomes available and approved by CARB and LAHD, it could be used to replace existing mitigation.	ALL	N/A – Not Quantified	
MM AQ-6	Starting January 1, 2019, 95% of ships calling at Everport Container Terminal (ECT) shall be required to comply with the expanded VSRP.	Ships: Main Propulsion Engines	PM_{10}	13 – 18% varying each year
			$PM_{2.5}$	12 – 18% varying each year
			NO_X	11 – 15% varying each year
			SO_X	19 – 28% varying each year
			CO	07 – 10% varying each year
			VOC	04 – 06% varying each year
MM AQ-7	Starting 2020 or upon substantial completion of construction, 85% of ships calling at ECT shall be required to utilize Alternative Maritime Power (AMP). By 2026, 95% of ships shall be required to use AMP.	Ships: Aux Engines and Boilers	PM_{10}	07 – 17% varying each year
			$PM_{2.5}$	05 – 18% varying each year
			NO_X	21 – 60% varying each year
			SO_X	02 – 11% varying each year
			CO	08 – 20% varying each year
			VOC	07 – 20% varying each year
		AMP Electricity Use	PM_{10}	100% increase
			$PM_{2.5}$	100% increase
			NO_X	70 – 42% increase varying each year
			SO_X	75 – 40% increase varying each year

Table CARB-3-8: Effects of Mitigation Measures on Emissions Source Groups

Measure	Brief Description	Source Category	Peak Day Reduction	
			CO	60 – 33% increase varying each year
			VOC	0%
LM AQ-1	Every five years, LAHD and the tenant shall meet to determine if newly available technology for reduction of emissions is feasible for use at ECT. Any new technology could replace the requirements of other mitigation measures pending approval by LAHD.	ALL	N/A – Not Quantified	
LM AQ-2	A priority access system shall be evaluated to identify one or more ways to provide preferential access for zero- and near-zero- emission trucks.	Trucks	N/A – Not Quantified	
MM GHG-1	All high mast pole fixtures at ECT shall be replaced with LED fixtures or a technology with similar energy-saving capabilities.	N/A – No Dispersion Source Applicable	20 – 28% reduction in carbon dioxide equivalents (CO2e) decreasing each year	
MM GHG-2	Photovoltaic panels shall be installed over the employee parking lot as part of the backland development pending a feasibility study.	N/A – No Dispersion Source Applicable	N/A – Not Quantified	

Notes:
All reductions mentioned in this table are for the Proposed Project. While not identical, reductions are similar for Alternatives 1-5.
All construction emission reductions are based on the ocean disposal scenario.
Emission reductions are based on peak day emissions. Emission reductions for average day emissions are usually greater and never less.

Response to Comment CARB-4

The comment is noted. The comment is general and does not identify any specific deficiencies or contest the adequacy of the Draft EIS/EIR; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

Response to Comment CARB-5

The comment is noted. Please see Master Response 2: Zero-Emission Technologies, and Master Response 3: Port-wide Emission Reduction Programs.

Response to Comment CARB-6

The comment is noted. Alternative 5 in the Draft EIS/EIR presents LAHD's analysis of an expanded on-dock rail alternative. The air quality impacts associated with Alternative 5 can be found starting on page 3.2-205 of the Draft EIS/EIR.

Response to Comment CARB-7

The comment is noted. Thank you for the reference to the 2016 Draft Technology Assessment: Freight Locomotives. Although CARB is recommending that the Port require Tier 4 locomotives as mitigation,

neither the Port nor the Everport Container Terminal has any jurisdiction or an implementation mechanism for such a requirement. LAHD is pre-empted by the federal Surface Transportation Board from requiring/mandating certain types of locomotives be operated at the Port. Because of this limited jurisdiction and the much broader state-wide jurisdiction and mission of CARB, achieving accelerated conversion of the locomotive fleet that serves California might be better served through initiation by CARB or the USEPA.

Response to Comment CARB-8

The comment is noted. LAHD will require at least 90 percent utilization of shore-based power by 2020 for vessels equipped with shore power capabilities as mandated in Proposition 1B. The text of mitigation measure MM AQ-7 has been revised to reflect this in the Final EIS/EIR. The calculations in the Draft EIS/EIR represent a conservative analysis with 85 percent shore-based power utilization because shore-based power is lower emitting than power from ship engines. Therefore, the analysis provided in the Draft EIS/EIR is conservative and does not require revisions.

LAHD encourages all tenants to strive for 100 percent utilization of shore power but recognizes that 100 percent utilization is not obtainable due to real world market conditions discussed below. The Everport Container Terminal does occasionally service non-Evergreen ships and may continue to do so in the future. These other vessels may or may not be equipped to utilize shore power; therefore, the air quality impact analysis reasonably assumes 90 percent utilization by 2020 and 95 percent utilization with MM AQ-7 by 2026. Please also see Master Response 1: Feasible Mitigation – Guidance and Applicability for a description of mitigation feasibility, and Master Response 3: Port-wide Emission Reduction Programs.

The requirement to utilize shore power or an alternative capture and control system is not applied to construction-related ocean-going vessels because only one to two such vessels are expected to be utilized during construction. These cargo vessels, intended to deliver cranes to the Project site, may or may not be able to use shore power. These vessels would only be hoteling for a maximum of two weeks total (one week each vessel). Therefore, it is not anticipated that the ocean-going vessels required for construction would generate substantial emissions. Annual emissions for the crane deliveries is presented in the Draft EIS/EIR, Appendix B1, Table 37 and indicate emissions of all criteria pollutants except NOx would be less than 1 ton per year, and NOx emissions would be less than 9 tons per year. The cargo ships used for crane delivery would be subject to the vessel speed reduction mitigation measure (MM AQ-6). Also, please see Master Response 1: Feasible Mitigation – Guidance and Applicability for a description of mitigation feasibility and Master Response 2: Zero Emission Technologies and Master Response 3: Port-wide Emission Reduction Programs for a discussion and links to on-going LAHD efforts to reduce emissions from Port operations. Finally, both of the Bay Area Ports are considering, as part of the 2017 CAAP Update, implementation of a differentiated rate structure on ships according to engine tier level to encourage calls by cleaner ships and to discourage older ships. However, this potential rate structure, if adopted, would be implemented Port-wide and not on a project-by-project basis.

Response to Comment CARB-9

Please see Master Response 2: Zero-Emission Technologies and Master Response 3: Port-wide Emission Reduction Programs. As noted in that response, LAHD and Everport are in the process of testing several zero-emission yard tractors. Other cargo handling equipment zero-emission technologies are not yet ready for commercialization.

Response to Comment CARB-10

The comment is noted. The proposed Project would not result in a reasonably foreseeable change or increase the number of refrigerated containers (reefer) plugs at the ECT, and thus, additional reefers and their potential effects are not included in the proposed Project. Reefers are included in total TEU numbers, and although the number of refrigerated units does shift over time, each reefer is plugged into the terminal's power supply, eliminating the need to power the reefers using fossil-fuel generators. Because the proposed Project would not increase the number of reefer plugs at the terminal, the maximum capacity of the terminal to process refrigerated containers is therefore expected to remain constant throughout each alternative, year, and mitigation scenario. The electrical demand of keeping a container refrigerated while at the terminal is not calculated because it is a constant throughout each scenario. Once the reefers leave the terminal, a secondary power supply is necessary, however, the recommendation that refrigerated containers transported by rail be required to be plugged in to hydrogen fuel cells (or other available technology) on adjacent rail cars is not within the Port's control, as it has no jurisdiction over railroad operations, which are governed at the Federal level and preempt Port oversight. Therefore, the modeled results presented in the Draft EIS/EIR are conservative and no changes to the model or impact analysis is required.

Response to Comment CARB-11

The comment that the LAHD should expand MM AQ-1 to require use of the cleanest available commercial harbor craft (CHC) (LPG/LNG, biodiesel, electric hybrid) during operations is noted. While LAHD will continue to identify methods to reduce emissions from all harbor craft including assist tugs, a one-size fits all strategy is not likely to be successful given the variety of engine sizes and types used on harbor craft. Therefore, the strategy to address harbor craft emissions has been outlined in the Draft 2017 CAAP Update, which will be implemented Port-wide, not on a project-by-project basis. Please also see Master Response 1: Feasible Mitigation for a description of what is generally feasible under CEQA.

In addition, note that the future scenarios for the proposed Project and all alternatives assumes that the assist tugs associated with terminal operations will meet Tier 3 standards, given the estimated propulsion engine model years. The Draft EIS/EIR, Appendix B1, Table 84 (beginning on page 290 of the Appendix B1 pdf file) indicates that assist tug average propulsion engine model year is estimated to be 2016 for operations in 2019, 2026, and 2033, and the engine model year is estimated to be 2037 in 2038, using a 21-year useful life. Therefore, the assist tugs assumed for operational emission calculations would already meet Tier 3 standards given the CARB implementation schedule for harbor craft engine standards.

Response to Comment CARB-12

The comment is noted. When the project construction is completed, it is projected that the terminal will grow in TEUs handled per year. Although the vessels calling at the Everport Container Terminal already have high compliance rates with the VSRP, the additional ship calls associated with the proposed Project will also be required to comply with the expanded VSRP (12 knots at 40 nautical miles). In addition, please see Master Response 1: Feasible Mitigation – Guidance and Applicability, and Master Response 3: Port-wide Emission Reduction Programs. LAHD continues to support the development of emission reduction technologies and procedures, including those for OGVs using Port of Los Angeles facilities. However, as these technologies become available they will be implemented Port-wide, using lease measure LM AQ-1.

Response to Comment CARB-13

The comment is noted. The commenter has recommended that the tenant equipment and technology feasibility review occur every two years rather than a five-year period required in lease measure LM AQ-1. The development of zero-emission technology equipment from concept and prototyping, through capability

and longevity demonstration, and then to commercial production (assuming technical and economic feasibility has been demonstrated) is a relatively slow and methodical process, especially for container terminals that pose challenging operating conditions. Some zero-emission technologies are also dependent on the concurrent development of alternative fuel infrastructure and/or energy storage technology advancements. Because of the long development lifecycle of zero-emission technology equipment, the recommendation of a two-year review period is not warranted. Further, a two-year review period would not allow for the amortization of new equipment, which typically have life-cycles that exceed two years. It should be noted that the proposed new lease would be for a period of 30 years. Per LM AQ-1, any time the tenant needs to replace or turnover equipment in its fleet, the tenant shall meet with LAHD to determine if something cleaner is feasible or technologically available. Also per LM AQ-1, when no new purchase or equipment turnover occurs, a five-year period is appropriate over the course of the lease to incorporate the potential emergent of new emission reduction technologies and time for the applicant/tenant to incorporate these new technologies into their operations. Please also refer to Master Response 1: Feasible Mitigation – Guidance and Applicability.

Response to Comment CARB-14

The comment is noted. The specific type of dredge used will depend on the dredge(s) that the successful bidder has in its fleet. However, a clam shell-type dredge was assumed for the analysis. The engine assumptions used in the air quality impact analysis for dredging and pile driving were provided in Table 10 of Appendix B1 of the Draft EIS/EIR and schedule assumptions were provided in Table 9 of Appendix B1. Finally, the construction harbor craft (tugs and dive boats) assumptions were included in Table 24 of Appendix B1. The general information and assumptions regarding the dredge barge equipment and engines, and associated harbor craft are now provided in Table CARB-14-1 below for further clarification.

Table CARB-14-1: Construction Dredge Barge and Piling Barge Equipment Information

Equipment	No. of equip.	HP (per piece of equipment)	LF (per piece of equipment)	hours/day	Total days
Dredge Barge:	1			22	28
Barge Crane	1	300	0.29	22	28
Deck Door Eng	1	86	0.89	22	28
Dredge (Clam Shell)	1	527	0.51	22	28
Generator	1	464	0.75	22	28
Hoist Swing Winch	1	379	0.31	22	28
Hoist Swing Pump	1	517	0.71	22	28
Tug Boat (derrick barge)	1	680x2	0.31	5	28
Dump Scows	2			8	28
Generators	2			1	28
Tug Boats (scows)	2	680x2	0.31	22	28
Derrick Barge (Piling):	1			8	170
Compressor	1	353	0.54	4	170
Barge Crane	1	300	0.29	8	170
Deck Door Eng	1	86	0.89	8	170
Generator	1	464	0.75	8	170
Hoist Swing Winch	1	379	0.31	8	170
Hoist Swing Pump	1	517	0.71	8	170
Vibratory Hammer	1	439	0.62	4.8	170
Pile Hammer	1	439	0.62	0.8	170
Jet Pump	1	113	0.74	8	170
Supply Barge (no equip)	1			8	170
Tug Boat (supply barge)	1	680x2	0.31	2	170

Table CARB-14-1: Construction Dredge Barge and Piling Barge Equipment Information

Equipment	No. of equip.	HP (per piece of equipment)	LF (per piece of equipment)	hours/day	Total days
Dive Boat	1	528x2	0.38	3	170

Notes:
HP = engine horsepower
LF = load factor

Regarding mitigation, LAHD has verified that electric dredge equipment has been demonstrated to be technologically feasible, and is commercially available. Mitigation measure MM AQ-5 has been revised to require, subject to availability at the time of construction, electric dredge equipment for construction of the proposed Project. See Chapter 3 of this Final EIS/EIR for the addition of this requirement to MM AQ-5. Note that the mitigated construction results are not being revised based on this addition to the mitigation measures. Therefore, the mitigated construction emissions within the EIS/EIR are considered conservative.

Response to Comment CARB-15

The comment is noted. Please see Master Response 2: Zero-Emission Technologies, and Master Response 3: Port-wide Emission Reduction Programs. As noted in Master Response 2, zero- and near-zero- emission technologies are not commercially feasible. When these technologies become commercially available, lease measure LM AQ-1 will be used to incorporate them into terminals Port-wide. Note that the commenter suggests that "…LAHD should require medium-duty and heavy-duty trucks traveling within 100 miles of the terminal use zero and near-zero technology." Since neither LAHD nor the Everport Container Terminal operator control every truck traveling within 100 miles of the Port; therefore, this is not an appropriate mitigation measure for the proposed Project's EIS/EIR (see Master Response 1: Feasible Mitigation – Guidance and Applicability).

Response to Comment CARB-16

The comment is noted. As described in Section 7.0 of Appendix B3, this risk assessment used health-protective assumptions to provide a margin of safety with respect to human health. The Port elected to start the cancer risk exposure period in 2018 for all receptor types for several reasons. First, 2018 is the first planned year of proposed Project construction, when construction emissions would combine with operational emissions to produce a temporary spike in emissions that would coincide with the highest-weighted age range (3rd trimester to 2 years) for residential risk. Second, this exposure period represents immediate impacts to the surrounding community. By contrast, starting the exposure period in 2033 would mean the cancer risk impact would not even begin for another 16 years. Third, the Port would have low confidence in the estimated cancer risks for an exposure period starting in 2033 because (a) all but the first five years of the exposure period would take place after the proposed Project's lease expires in 2038; and (b) the exposure period would extend well beyond the current forecast horizons for air quality emissions models (they currently forecast to about 2045 or 2050).

Nevertheless, for informational purposes, the Port conducted a sensitivity analysis for two HRA receptors to see how the predicted cancer risks would change if the exposure period was to start in 2033 instead of 2018. The sensitivity analysis is provided as an additional appendix in Chapter 3 of this Final EIS/EIR and summarized herein. The two selected receptors were the maximally impacted residential and sensitive receptors for the NEPA increment, as shown in Table 3.2-27 of the Draft EIS/EIR. For lack of better data, proposed Project emissions were assumed to continue until the end of the exposure period (even beyond the proposed lease period) at the same rate as their latest projected year in the Draft EIS/EIR. The sensitivity analysis showed that the unmitigated cancer risks for the proposed Project before subtracting baseline would be about 3 to 4 percent (about 2 per million) higher for both receptor types if the exposure period

were to start in 2033 instead of 2018. The mitigated cancer risks would be about 1 percent (0.6 per million) lower for the residential receptor and 0.6 percent (0.2 per million) higher for the sensitive receptor. Both the mitigated and unmitigated results would be below the threshold of significance. The chronic and acute hazard indices would not be affected because they were analyzed in the Draft EIS/EIR with their maximum emissions from all analysis years. Therefore, no finding would have changed as a result of the conducting the HRA in the manner suggested by the commenter.

Response to Comment CARB-17

The comment is noted. The Draft EIR/EIS included text and table footnotes in Appendix B3 to describe the meaning of the tabular results. For example, the "Proposed Project" column in Table B3-5 represents the maximum predicted health values associated with construction and operation of the proposed Project, before subtracting the baseline health values. This is indicated in Footnote (a). The "CEQA Baseline" column represents the maximum predicted health values associated with operation of the CEQA baseline. The emissions assumed for the CEQA baseline are described in Section 2.1 of Appendix B3. The "CEQA Increment" column represents the maximum difference of the Proposed Project minus the CEQA Baseline, determined by subtracting the results at each receptor and selecting the maximum receptor. This is indicated in Footnote (b) as well as the text on Page B3-18. The "Future CEQA Baseline" column represents the maximum predicted health values associated with operation of the future CEQA baseline. The emissions assumed for the future CEQA baseline are described in Section 2.1 of Appendix B3. The "Future CEQA Increment" column represents the maximum difference of the Proposed Project minus the future CEQA baseline, determined by subtracting the results at each receptor and selecting the maximum receptor. This is indicated in Footnote (c) as well as the text on Page B3-18. Furthermore, Footnote (d) explains that the maximum health values for the Proposed Project, CEQA Baseline, and CEQA Increment may not all occur at the same receptor location; likewise, the maximum health values for the Proposed Project, Future CEQA Baseline, and Future CEQA Increment may not all occur at the same receptor location.

The locations of the maximum increment receptors (i.e., corresponding to the maximum health values for the "CEQA Increment" and "Future CEQA Increment" in Table B3-5) are shown in Figure B3-3.

Response to Comment CARB-18

The comment is noted. As detailed in Response to Comment USEPA-12, before a project is authorized to utilize ocean disposal site, approval from the USEPA is required, which cannot be guaranteed at this time. Therefore, both 100 percent upland disposal and 100 percent ocean disposal options for dredged material were analyzed for air quality impacts, as presented in Section 3.2.4.5 of the Draft EIS/EIR, disclosing the impacts for whichever option is finally selected. Although Appendix F2 determined that ocean disposal of dredged material is the only practicable disposal option, should USEPA not grant approval of ocean disposal at LA-2, an upland disposal option will become necessary. Therefore, the Draft EIS/EIR intentionally evaluated both dredge material disposal options. In essence, the upland disposal scenario is analyzed to disclose the potential impacts in the case that USEPA approval for dredge material disposal at LA-2 is not granted. Regarding the comment that the referenced table should include the assumptions for ocean disposal, the key assumptions associated with ocean disposal are contained in Appendix B.

Response to Comment CARB-19

The comment is noted. Sweeper emission rates under former CARB CHE regulations would be higher across all criteria pollutants than sweeper emission rates as reflected in the CARB OFFROAD inventory. Therefore, the analysis presented in the Draft EIS/EIR is conservative and no changes to the model or impact analysis is needed. For the commenter's convenience, provided below are the CARB CHE sweeper

emission rates and the CARB OFFROAD sweeper emission rates, both in units of grams per hour. The CHE emission rates are presented in Appendix B1. The OFFROAD rates are from CARB's OFFROAD2007 emissions model. The rates below are for calendar year 2018.

Sweepers	CO	HC	TOG	NOx	PM	PM10	PM2.5	Sox	CO2	CH4	N2O
CHE	338.9	38.7	89.6	1074.9	41.7	41.4	39.6	1.7	165529	9.1	0.0
Offroad'07	145.9	-	40.5	275.2	9.2	9.2	9.1	0.8	73424	3.7	0.0

The text in the Draft EIS/EIR will be revised to show that sweepers are classified and regulated as OFFROAD equipment, not CHE, under CARB.

Response to Comment CARB-20

The comment is noted. The comment is general and does not identify any specific deficiencies or contest the adequacy of the Draft EIS/EIR; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

Response to Comment CARB-21

The comment is noted. A copy of the Final EIS/EIR will be provided as requested.

2.3.4 Regional and Local Government Comments

FORM GEN. 160 (Rev. 8-12)

APP NO. 131015-136

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

CITY OF LOS ANGELES
MAY - 9 2017
ENV MGMT DIV
HARBOR DEPARTMENT

DATE: May 1, 2017

TO: Christopher Cannon, Director of Environmental Management
Los Angeles Harbor Department

FROM: Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation

SUBJECT: **BERTHS 226-236 [EVERPORT] CONTAINER TERMINAL IMPROVEMENTS PROJECT – NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT STATEMENT/ ENVIRONMENTAL IMPACT REPORT**

This is in response to your April 18, 2017 letter requesting a review of your proposed improvement project located at 389 Terminal Way, Terminal Island. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) has reviewed the request and found the project to be related to physical improvements of facilities.

Based on the project description, we have determined the project is unrelated to sewer capacity availability, but may require sewer line relocation. We therefore do not have sufficient detail to offer an analysis for sewer capacity at this time. Should the project description change, please continue to send us information so that we may determine if a sewer assessment is required in the future. If sewer relocation is required for this project, the relocation must be coordinated with the Bureau of Sanitation. **BOS-1**

If you have any questions, please call Eduardo Perez of my staff at (323) 342-6207.

STORMWATER REQUIREMENTS

LA Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on Stormwater Low Impact Development (LID) requirements. The projects that are subject to LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "*Development Best Management Practices Handbook – Part B: Planning Activities*". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding LID requirements be received in the early phases of the project from WPD's plan-checking staff. **BOS-2**

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-away to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements. **BOS-2 cont.**

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction. **BOS-3**

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18.

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684. **BOS-4**

EP/AP:as

c: Kosta Kaporis, LASAN
Daniel Hackney, LASAN
Eduardo Perez, LASAN

2.3.4.1 City of Los Angeles, Bureau of Sanitation, Wastewater Engineering Services Division (BOS)

Response to Comment BOS-1

Thank you for your comment. The comment indicates that the proposed Project is unrelated to sewer capacity availability, but may require sewer line relocation. Should sewer relocation be required, the relocation will be coordinated with the Bureau of Sanitation. The proposed Project does not require the relocation of any sewer line but LAHD will coordinate with BOS if such a need arises.

Response to Comment BOS-2

The comment is noted. The comment provides standard requirements related to the implementation of stormwater mitigation measures. Section 3.11.3.10 of the Draft EIS/EIR discussed the applicable regulations related to the Los Angeles Municipal Separate Storm Sewer System (MS4) permit, including the LID requirements, as they relate to the proposed Project. Additionally, Section 3.11.4.1 of the Draft EIS/EIR identifies LAHD's commitments during construction and long-term operation for the reduction of impacts on water quality, which includes LAHD incorporating MS4/LID measures into the proposed Project design for review and approval. The impact analysis (Section 3.11.4.3 under Impact WQ-1) in the Draft EIS/EIR assumes runoff at the Project site will be collected by the on-site storm drain system and is managed in compliance with applicable permits and ordinances (including MS4/LID requirements).

The comment provides background on the City's Green Street Initiative. It should be noted that the proposed Project includes closure of portions of Terminal Way, Barracuda Street, Tuna Street, and Ways Street within the Project site and rerouting of Terminal Way traffic to Cannery Street. The Project site is at the downstream end of the watershed and in a location (within Harbor waters) where groundwater recharge does not provide a water supply benefit; therefore, the proposed Project does not have the opportunity to implement Green Street elements.

Response to Comment BOS-3

The comment is noted. Section 3.11.3.9 of the Draft EIS/EIR discusses the State Water Resources Control Board Stormwater Permits that are applicable for construction activities. Additionally, Section 3.11.4.1 of the Draft EIS/EIR identifies the assumptions that will be adhered to during construction for the reduction of impacts to water quality.

Response to Comment BOS-4

The comment is noted. The proposed Project does not involve residential development or the addition of building floor area. All improvements would occur within the existing limits of the terminal, and do not include any new building areas. Therefore, the recycling requirements discussed by the commenter are not applicable.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL & USPS:

June 2, 2017

theresa.stevens@usace.army.mil
U. S. Army Corps of Engineers, Los Angeles District
Regulatory Division
ATTN: Ms. Theresa Stevens, Ph.D.
2151 Alessandro Drive, Suite 110
Ventura, California 93001

ceqacomments@portla.org
City of Los Angeles Harbor Department
Environmental Management Division
ATTN: Mr. Christopher Cannon, Director
P.O. Box 151
San Pedro, CA 90731

Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) for the Proposed Berths 226-236 [Everport] Container Terminal Improvements Project ("Proposed Project") (SCH No.: 2014101050)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIS/EIR.

SCAQMD staff understands that the fundamental purpose of the proposed project is to increase the container-handling efficiency and capacity of the existing Everport Container Terminal ("Terminal") at the Port of Los Angeles ("Port") in order to accommodate larger container vessels of up to 16,000 twenty-foot equivalent units [TEUs] that are anticipated to call at the Terminal through year 2038. This proposed project supports the long-term development and growth of the Port.

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP[1] is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

SCAQMD-1

[1] South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Available at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.

SCAQMD staff supports the Port's commitment to improve air quality while the Port continues to be economically competitive, efficient, and environmentally sustainable. This commitment was recently reaffirmed in the San Pedro Bay Ports Clean Air Action Plan 2017 Discussion Draft[2]. As described above, achieving NOx emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attaining the ozone NAAQS as expeditiously as practicable, and we believe that the Port plays an important role in supporting SCAQMD's commitment.

Project Description

The Lead Agency proposes to dredge and dispose of approximately 38,000 cubic yards of sediment, provide structural improvements to stabilize the wharf, raise the existing eight cranes, install five new cranes, build vessel servicing infrastructure with five maritime power vaults, and develop 23.5 acres as new terminal backlands on 229 acres. The Lead Agency also proposes to extend the Terminal lease by 10 years from 2028 through 2038. **SCAQMD-1 cont.**

Construction is expected to take approximately 24 months and would begin in late 2017[3]. The Terminal would continue to operate during construction with vessels using Berths 226-229 while Berths 230-232 are under construction, and vice versa[4]. By year 2038, approximately 2.38 million TEUs (an increase of 1.14 million TEUs from 1.24 million TEUs in year 2013) and 208 annual vessel calls (an increase of 42 from the 166 vessel calls in 2013)[5] are expected at the Terminal. The number of trains would increase to approximately six trains per day from the two in year 2013. Daily truck trips would also increase by 2,523 to 7,028 daily truck trips in the peak month[6]. The net increase in employment attributable to the proposed project (direct) would be 4,230 jobs in year 2038[7].

Air Quality and Health Risk Assessment (HRA) Analyses

The Lead Agency found that the proposed project's regional air quality impacts from construction for NOx in 2018 and 2019[8] and for VOC in 2019 will be significant and unavoidable after mitigation[9]. Overlapping construction and operational emissions will remain significant after mitigation for NOx in 2019.[10] The Lead Agency also found that maximum off-site ambient air pollutant concentrations during construction would be significant and unavoidable for NO_2 (federal 1-hour average), and overlapping construction and operations would be significant and

[2] San Pedro Bay Ports. November 2016. *Clean Air Action Plan 2017: Draft Discussion Document*. Available at: http://www.cleanairactionplan.org/wp-content/uploads/2016/11/CAAP-2017-Draft-Discussion-Document-FINAL.pdf.
[3] Draft EIS/EIR. Executive Summary. Page ES-11.
[4] Draft EIS/EIR. Project Description. Page 2-36. Table 2-3: *Construction Schedule*, Page 2-37.
[5] Draft EIS/EIR. Project Description. Table 2-1: *Existing and Projected Berths 226-236 [Everport] Container Terminal Throughput*. Page 2-4.
[6] Draft EIS/EIR. Project Description. Page 2-39.
[7] Draft EIS/EIR. Executive Summary. Page ES-68.
[8] Draft EIS/EIR. Executive Summary. Table ES-3: *Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives*. Page ES-27.
[9] *Ibid.*
[10] *Ibid.*

unavoidable for NO_2 (federal 1-hour average) and PM_{10} (24-hour and annual average)[11]. The proposed project's regional operational impacts after incorporating mitigation measures will remain significant and unavoidable for CO and VOC in year 2033 and year 2038.[12] The proposed project's mitigated maximum cancer risk (MICR) for residential, occupational, and sensitive receptors was found to be 1.3 in a million, 5.8 in a million, and 0.8 in a million, respectively[13]. **SCAQMD-1 cont.**

After a review of the air quality and health risk analyses and supporting technical documents, SCAQMD staff has concerns about the analyses in the Draft EIS/EIR, which have likely led to an under-estimation of the project's impacts. First, the analyses improperly credit the proposed project with emission reductions that will occur independent of the proposed project due to adopted state and federal rules and regulations. Second, the modeling performed for the proposed project used improper parameters and outdated meteorological data. Additional details are included in the attachment. The attachment also includes a discussion of recommended changes to the existing mitigation measures for air quality which the Lead Agency should implement. **SCAQMD-2**

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIS/EIR. Further, SCAQMD staff is available to work with the Lead Agency to address the comments raised herein and any other questions that may arise. If you have any questions regarding this letter, please contact me at jwong1@aqmd.gov or Lijin Sun, Program Supervisor, CEQA IGR, at lsun@aqmd.gov. **SCAQMD-3**

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment
JW:LS/JC/MS/GM
LAC170421-03
Control Number

[11] *Ibid*.
[12] *Ibid*. Page ES-28.
[13] Draft EIS/EIR. Section 3.2, Air Quality and Meteorology. Table 3.2-26: *Maximum CEQA Health Impacts Estimated for Construction and Operation of Proposed Project*. Page 3.2-68.

ATTACHMENT

CEQA Baseline

1. The Draft EIS/EIR should include a realistic baseline which accurately reflects the improvements in air quality that will occur, independent of the proposed project. The CEQA baseline year for determining the air quality impacts from criteria pollutants was 2013[14]. This baseline is held constant (i.e. using emission rates from 2013) and compared to future interim years under the proposed project (i.e. using emission rates from future years). This approach using a comparison between the proposed project's impacts in future years (using emission rates from those years) and a 2013 baseline (using emission rates from 2013) improperly credits the proposed project with emission reductions that will occur independent of the proposed project due to adopted state and federal rules and regulations, since these rules and regulations are expected to improve air quality, even in the absence of the proposed project. Therefore, SCAQMD staff believes that the proposed project may have underestimated the true impacts attributable to the proposed project's activities. In *Neighbors for Smart Rail v. Exposition Metro Line Construction (2013) 57 Cal.4th 439*, the California Supreme Court held that using a future baseline is proper in some cases. The purpose of CEQA is to disclose environmental impacts from the proposed project to the public and decision makers in order to provide the public and decision makers with the actual changes to the environment from the activities involved in the proposed project. By taking credit for future emission reductions from existing air quality rules and regulations, the proposed project's air quality impacts are underestimated. Therefore, SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include a comparison between the emissions in year 2019, year 2026, year 2033, and year 2038 with the proposed project and the emissions in the same respective years without the proposed project, and use this analysis to determine the level of significance. By using a consistent emission rate for the analysis, the air quality and health risk impacts of the project will be accurately disclosed (i.e. impacts based on the change in activity due to the proposed project). **SCAQMD-4**

SCAQMD's Air Quality CEQA Thresholds of Significance

2. Based on the proposed project's construction schedule[15], construction and operation activities are expected to overlap in 2018 and 2019. In the case of overlapping construction and operation activities, SCAQMD staff recommends adding the construction and operational emissions and comparing those emissions to the SCAQMD's air quality CEQA significance thresholds for operation[16]. **SCAQMD-5**

Methodology for Determining the Significance of Air Quality Impacts

3. As described in Comment No. 1, SCAQMD staff found that the proposed project's operational air quality emissions from criteria pollutants, with and without mitigation, were first subtracted **SCAQMD-6**

[14] Draft EIS/EIR. Executive Summary. Page ES-5.
[15] Draft EIS/EIR. Project Description. Table 2-2: *Construction Schedule*. Page 2-37.
[16] South Coast Air Quality Management District. *SCAQMD Air Quality Significance Thresholds*. Available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2.

from the 2013 CEQA baseline air emissions, and the resulting differences were compared to the SCAQMD's regional air quality CEQA significance thresholds to determine the level of significance in year 2019, year 2026, year 2033 and year 2038. However, based on a review Appendix B3, *Health Risk Assessment*[17], SCAQMD staff found that the methodology for the HRA analysis included a comparison between potential health risks in year 2038 with and without the proposed project to determine the level of significance without subtracting the 2013 CEQA baseline. As such, SCAQMD staff found that the methodology for determining the significance of air quality impacts is not consistent with the methodology for determining the significance of health risks. It is recommended that the Lead Agency use consistent methodologies when determining both air quality and health risk impacts in the Final EIS/EIR. **SCAQMD-6 cont.**

Air Dispersion Modeling Parameters

4. Some of the receptors were placed within the volume source exclusion zone, and the results at these locations might not be accurate. Therefore, SCAQMD staff recommends that the Lead Agency revise the HRA by using a greater number of smaller volume sources to avoid placing receptors within the volume source exclusion zone. **SCAQMD-7**

5. The Lead Agency used differing Locomotives transit – Day and Night release heights in their source parameters (Day – 5.6 meters and Night – 14.6 meters). Appendix B2, Section 3.1.2 Operational Emission Sources, stated that the "locomotives in transit were set to different heights for daytime conditions compared to nighttime conditions." Changes in atmospheric conditions are already accounted for within AERMOD. By using higher nighttime release heights, the Lead Agency has likely underestimated health risks. The Lead Agency should revise the HRA to use the same release heights for daytime and nighttime locomotive emissions and re-evaluate the health risks. **SCAQMD-8**

6. Page B2-8 of Appendix B2 of the Draft EIS/EIR indicated that 2006-2007 meteorological data from the Terminal Island Water Reclamation Plant (TITP) was used for dispersion modeling for both criteria pollutants and toxic air contaminants (TACs). The meteorological data is outdated, and the Lead Agency used an outdated version of AERMOD to process the meteorological data. SCAQMD staff has prepared AERMOD-ready meteorological data which could be used by the Lead Agency in the air quality analysis[18]. The Lead Agency could use the SCAQMD meteorological data collected at the Long Beach station[19]. Additionally, the U.S. EPA recommends that for on-site meteorological data, the most recent five-year data be used for the purposes of air dispersion modeling[20]. Therefore, SCAQMD staff recommends that the Lead Agency update HRA using the latest five years of available meteorological data **SCAQMD-9**

[17] Draft EIS/EIR. Appendix B3-Health Risk Assessment. Table B3-5: *Maximum CEQA Health Impacts Estimated for Construction and Operation of the Proposed Project Without Mitigation.* Page B3-17.
[18] South Coast Air Quality Management District. Meteorological Data for AERMOD. Available at: http://www.aqmd.gov/home/library/air-quality-data-studies/meteorological-data/data-for-aermod.
[19] *Ibid*.
[20] United States Environmental Protection Agency. February 2000. *Meteorological Monitoring Guidance for Regulatory Modeling Applications*. Page 6-30. Available at: https://www3.epa.gov/scram001/guidance/met/mmgrma.pdf. See also 40 CFR Ch. I (7-1-11 Edition). *Appendix W to Part 51 – Guideline on Air Quality Models*. Available at: https://www.gpo.gov/fdsys/pkg/CFR-2011-title40-vol2/pdf/CFR-2011-title40-vol2-part51-appW.pdf.

and use AERMET version 16216 (or the most recent version available at the time of analysis) to process the data. Updates and improvements to AERMET may also affect the air dispersion modeling results. **SCAQMD-9 cont.**

Methodology for Determining Morbidity and Mortality Impacts

7. Mortality is a measure of the number of deaths in a population, scaled to the size of that population, per unit time. Morbidity refers to the number of individuals who have contracted a disease during a given time period (the incidence rate) or the number who currently have that disease (the prevalence rate), scaled to the size of the population. On Page 3.2-76 of the Draft EIS/EIR, the Lead Agency found that the proposed project would not exceed the Los Angeles Harbor Department's (LAHD) criterion for calculating morbidity and mortality impacts attributable to PM, and that mortality and morbidity significance would be identified by exceedance of SCAQMD's PM2.5 localized significance criterion of 2.5 μg/m^3. **SCAQMD-10**

   First, SCAQMD staff does not agree with using SCAQMD's localized PM2.5 threshold as a screening threshold for determining the significance of morbidity and mortality impacts. The SCAQMD's PM2.5 significance threshold of 2.5 μg/m^3 is designed to determine the significance of localized impacts on nearby receptors, and it was made to be consistent with existing permitting requirements under SCAQMD Rule 1303. The PM2.5 significance threshold of 2.5 μg/m^3 was not intended to be used as a screening tool to determine if mortality and morbidity impacts analysis would be warranted. As such, SCAQMD staff recommends that the Lead Agency revise the PM mortality analysis and use the methods described in California Air Resources Board's 2010 guidance document[21]. Second, the analysis did not include a reference to the LAHD's criterion that was used for determining if calculating morbidity and mortality impacts attributable to PM would be warranted. As such, SCAQMD staff recommends providing a reference to the LAHD's criterion in the Final EIS/EIR.

Recommended Changes to Existing Mitigation Measures

Technology Review

8. The Draft EIS/EIR includes a mitigation measure under lease management (LM) AQ-1, which requires a review of new emissions reduction technologies for feasibility every five years beginning five years after the lease agreement. SCAQMD staff believes that the Lead Agency should take this opportunity to deploy the lowest emission technologies possible. This is consistent with Port's air quality commitment, as well as in support of SCAQMD's commitment to achieve NOx emission reductions. The deployment should include those technologies that are "capable of being accomplished in a successful manner within a reasonable period of time" (Public Resources Code Section 21061.1), such as zero and near-zero emission technologies that are expected to be available in the life of the proposed project. As such, SCAQMD staff recommends that the Lead Agency assess equipment availability, **SCAQMD-11**

[21] California Air Resources Board. August 31, 2010. *Estimate Premature Deaths Associated with Long-term Exposure to Fine Particle Pollution (PM2.5) in California Using a U.S. Environmental Protection Agency Methodology*. Available at: https://www.arb.ca.gov/research/health/pm-mort/pm-report_2010.pdf.

equipment fleet mixtures, and best available emissions control devices every two years beginning two years after lease agreement is entered. When a new emission control technology is found feasible and would substantially reduce air emissions, but the Lead Agency declines to implement such technology, a subsequent EIR shall be prepared (CEQA Guidelines Section 15162(a)(3)(C)). SCAQMD staff's recommended revisions to LM AQ-1 are below:

LM AQ-1: Replacement of Equipment and Review of New Technology **SCAQMD-11 cont.**

"[…] LAHD shall require the tenant to review any new emissions-reduction technology for feasibility and report back to LAHD every ~~five~~ two years beginning ~~five~~ two years after lease agreement if no new purchase or equipment turnover occurs sooner as noted in the aforementioned paragraph. If LAHD and tenant determine the technology is feasible in terms of cost and operations, subject to the requirements as set forth in the CEQA Guidelines Section 15162(a)(3)(C), the tenant shall work with LAHD to implement such technology."

Enforceability

9. Mitigation Measure (MM) AQ-2 and MM AQ-3 provide circumstances under which the EPA 2010 on-road haul truck and Tier 4 off-road construction equipment requirements would not apply. CEQA requires that mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments (Public Resources Code Section 21081.6 (b) and CEQA Guidelines Section 15126.4 (a)(2)). To ensure that the requirements set forth in MM AQ-2 and MM AQ-3 are enforceable, and to further reduce emissions during construction and operation, SCAQMD staff recommends the following revisions: **SCAQMD-12**

MM AQ-2: **On-Road Trucks Used During Construction.** On-road trucks shall comply with EPA 2010 on-road emission standards or better, unless the contractor ~~can reasonably demonstrate~~ provides a written finding consistent with project contract or lease management requirements and obtains written approval from the Lead Agency that such equipment is unavailable ~~to the satisfaction of LAHD~~.

MM AQ-3: Non-road Construction Equipment (except vessels, harbor craft, on-road trucks, and dredging equipment). All non-road construction equipment greater than 50 hp must meet EPA Tier 4 emission standards, unless the contractor ~~can reasonably demonstrate~~ provides a written finding consistent with project contract or lease management requirements and obtains written approval from the Lead Agency that such equipment is unavailable ~~to the satisfaction of LAHD~~.

General Conformity Determination

10. On May 17, 2017, SCAQMD staff received a letter from the Port requesting confirmation that the previously allocated emissions for construction in 2018 were still valid.[22] Based on a review of Appendix B4, *Draft General Conformity Determination*, SCAQMD staff found that **SCAQMD-13**

[22] E-mail correspondence and attachment on May 17, 2017 from the Port of Los Angeles Harbor Department (Ms. Yolanda Mativa) to SCAQMD (Dr. Phillip Fine).

construction emissions for year 2019 were not analyzed because "very little [construction] is expected to occur in 2019 […]"[23]. SCAQMD staff recommends that the Lead Agency provide an estimate of the proposed project's construction emissions in 2019 and compare those emissions to the de minimis thresholds in the Final EIS/EIR in order to provide substantial evidence that construction emissions in 2019 are below the de minimis thresholds. In the event that a general conformity determination for 2019 is required from SCAQMD, the estimation of the proposed project's construction emissions in 2019 will assist SCAQMD staff in reviewing and determining if the NOx emissions from 2019 can be accommodated within the General Conformity Budgets established in the Final 2012 AQMP.

SCAQMD-13 cont.

[23] Draft EIS/EIR. Appendix B4, Draft General Conformity Determination. Table 4-1, *Emission Scenario Years for General Conformity Evaluation Based on 2012 AQMP*. Page 4-2. Footnote 2 to Table 4-1.

2.3.4.2 South Coast Air Quality Management District (SCAQMD)

Response to Comment SCAQMD-1

The comment is noted. The comment summarizes the conclusions of the Draft EIS/EIR with respect to air quality impacts and does not identify any specific deficiencies or contest the adequacy of the Draft EIS/EIR; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

Response to Comment SCAQMD-2

The comment is noted. LAHD does not agree that there was any underestimation of emissions associated with the proposed Project. Please refer to responses to SCAQMD-4 through SCAQMD-10 for discussions of the specific technical issues to which this comment generally refers.

Response to Comment SCAQMD-3

The comment is noted. Responses to SCAQMD's comments are provided in this Final EIS/EIR. As required by law, LAHD will be providing all commenter's with written responses prior to the certification of the Final EIS/EIR.

Response to Comment SCAQMD-4

The comment is noted. The commenter contends that a comparison between the proposed Project's impacts in future years (using emission rates from those years) and a 2013 baseline (using emission rates from 2013) improperly credits the proposed Project with emission reductions that will occur independent of the proposed Project due to adopted state and federal rules and regulations, since these rules and regulations are expected to improve air quality, even in the absence of the proposed Project.

Draft EIS/EIR Section 3.2.4.2 discusses the legal basis for the selection of a 2013 CEQA baseline. The CEQA analysis of air quality impacts is based on a comparison of the proposed Project emissions to the baseline existing conditions. This is consistent with CEQA Guidelines §15125(a), which states that the environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. Section 15125(a) also provides that the existing conditions are normally described as they exist at the time the notice of preparation (NOP) is published, which, in the case of the proposed Project, was 2014. Other courts have also recognized the discretion of lead agency's to determine the baseline. (See *Communities for a Better Environment v. South Coast Air Quality Management Dist*. (2010) 48 Cal.4th 310, 320-322 [also reasoning that "the baseline for an agency's primary environmental analysis under CEQA must ordinarily be the actually existing physical conditions"].) For purposes of this Draft EIS/EIR, the CEQA baseline takes into account the throughput for the 12-month calendar year preceding NOP publication (January through December 2013) in order to provide a representative characterization of activity levels throughout the complete calendar year preceding release of the NOP.

Using existing conditions as the baseline is appropriate for the proposed Project air quality analysis because, in part, the analysis is based on comparison of the baseline with construction emissions and with operational emissions at several discrete points in time for specific analysis years. This approach is consistent with *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439. In that case, the Court held that the lead agency erred because there was not sufficient justification in the administrative record to justify its decision to use *only* a baseline of conditions projected to exist in the year 2030. In so holding, the Supreme Court endorsed the rule enunciated in *Sunnyvale West*

Neighborhood Assn. v. City of Sunnyvale City Council (2010) 190 Cal.App.4th 1351[1]: "[A] project's effects on future conditions are appropriately considered in an EIR's discussion of cumulative effects and in discussion of the no project alternative. (*Sunnyvale West, supra,* 190 Cal.App.4th at pp. 1381–1382.)" (*Neighbors for Smart Rail,* at p. 454.)

Here, the Draft EIS/EIR includes a comparison of the future Project emissions to an appropriate future baseline under the NEPA impact analysis discussion.[2] The NEPA Baseline operational emissions, by year, are presented in the Draft EIS/EIR, Section 3.2.4.3, Table 3.2-5, on pages 3.2-18 and 19. Comparison of the proposed Project emissions, by year, against the NEPA Baseline (same emissions as the No Project Alternative) Study Year scenarios are presented in the Draft EIS/EIR, Section 3.2.4.5, Table 3.2-20, on pages 3.2-46 through 48 (under the NEPA Impacts rows for each Study Year). Therefore, the comparison between the proposed Project and a future baseline (the NEPA Baseline/No Project scenario) in a manner that applies the same emission factors and regulations to each scenario has already been presented in the Draft EIS/EIR, as requested. The significance threshold used for NEPA impact analysis is identical to the threshold used for the CEQA impact analysis, thus disclosing the significance of the project's impacts as compared to a future baseline. Mitigation measures will be implemented for both CEQA and NEPA significant impacts.

The approach used in the Draft EIS/EIR (i.e., the use of existing conditions as a CEQA baseline to determine CEQA impacts, while at the same time disclosing impacts against a future baseline as part of the No Project/No Action analysis), was upheld in the matter of *Fast Lane Transportation, Inc. v. City of Los Angeles, et al. (2016) Case No. CIV. MSN-14-0300, the full decision of which is incorporated herein by reference*.

Response to Comment SCAQMD-5

The comment is noted. The Port used the construction thresholds when assessing overlapping construction and operation activities because the impacts would occur during the construction period, prior to operation of the Project in its proposed configuration as described in the EIS/EIR.

Response to Comment SCAQMD-6

The comment is noted. To the extent the commenter is asserting that the HRA only evaluated year 2038, improperly did not subtract the 2013 CEQA baseline, and was required to use the same assumptions and methodologies as those used in the analysis of air quality, the commenter is incorrect. As explained in Sections 2.1 and 2.2 of Appendix B3, the HRA analysis and the methodologies used to prepare the HRA are supported by substantial evidence and did not evaluate only the year 2038. For example, residential cancer risks for the proposed Project were determined by modeling emissions over a 30-year period, 2018-2047. Non-cancer risks were determined by modeling maximum emissions from years 2018, 2019, 2026, 2033, and 2038. The HRA used industry standard models (AERMOD and HARP2) and exposure assumptions built into the models and consistent with current guidance (OEHHA, 2015. *Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments*. February).

[1] The Court disapproved Sunnyvale West "insofar as [it holds] an agency may never employ predicted conditions as the sole baseline for analysis of a project's environmental impacts." (*Neighbors for Smart Rail,* 57 Cal.4th at p. 457.)

[2] Note the operational emissions for the NEPA Baseline (Alternative 1) are identical to operational emissions for the CEQA No Project scenario (Alternative 2), as noted in the Draft EIS/EIR, Section 3.2.4.5, Alternative 2, Impact AQ-3, on page 3.2-110

Regarding the methodology for determining the significance of impacts under CEQA, the HRA is consistent with the other portions of the air quality analysis because it compares the future proposed Project risk to the 2013 CEQA baseline risk. This risk increment is shown in the 5th column of Table B3-5 ("CEQA Increment"). However, as explained in Section 2.1 of Appendix B3, the extremely long exposure periods assumed in the HRA for cancer risk (30 years for residential exposure and 25 years for occupational exposure) make cancer risk unique among all other air quality indicators in the DEIS/EIR. Therefore, to resolve the complexity of evaluating a fixed point in time (the 2013 baseline condition) over decades-long exposure periods, the Port elected to evaluate the CEQA baseline cancer risk using a second approach. In this second approach, the "future CEQA baseline" is evaluated by assuming constant 2013 terminal activity levels for each year of the exposure period, but the emission factors vary year-by-year, starting with 2013 and continuing for the entire exposure period. The "Future CEQA Increment", which is the future proposed Project risk minus the future CEQA baseline risk, is shown in the 7th column of Table B3-5. The purpose of the Future CEQA Increment is not to compare the project to a without-project scenario, as asserted by the commenter, but rather to compare the proposed Project to an alternate, less conservative version of the 2013 CEQA baseline (the subtraction of which yields a more conservative project increment).

The need to compare the proposed Project to two versions of the CEQA baseline does not exist for any other air quality indicators (such as regional criteria pollutant emissions, local criteria pollutant concentrations, or the chronic and acute hazard indices) because the other indicators are based on emissions or modeled concentrations over the period of one year or less, which fit entirely within the 2013 baseline period. Therefore, evaluation of a future baseline is not applicable to any air quality indicator except cancer risk.

Please see the Response to Comment SCAQMD-4 for the legal justification for the selection of the CEQA baseline in the HRA and air quality impacts analysis.

Response to Comment SCAQMD-7

The commenter recommends that the HRA be revised to use a greater number of smaller volume sources to avoid placing receptors within the volume source exclusion zone. The comment is noted. The HRA, however, is supported by substantial evidence and was expansive in scope. The air dispersion modeling for example, using AERMOD, predicts the reasonably foreseeable project-related impacts to ambient air quality from the operation of ships, harbor craft, cargo handling equipment, rail locomotives, and container trucks at the Everport Container Terminal, as well as from construction equipment used to build the project elements. The vessels, equipment, and vehicles are modeled in AERMOD as either area sources or volume sources. Ships and the assist tugs, rail locomotives, and trucks travel on set paths (shipping lanes, rail lines, or roadways), and are modeled as line sources in AERMOD. These line sources are analyzed by creating a series of volume sources along the ship or equipment path. Cargo handling and project construction equipment generally operate within the confines of the terminal boundary, and are modeled as areas sources with an extent and shape that matches the terminal area, or the specific construction area where the equipment would operate. Each model run included in the Draft EIS/EIR analyzed up to 9,500 individual area and volume sources.

Receptors were also incorporated into the AERMOD models. These receptors are the geographic locations where air pollutant concentrations are calculated, and typically represent residents, school children, offsite workers, or other potentially impacted populations. Each model run typically analyzed concentrations at 1,300 receptors. The AERMOD algorithms make no restrictions on the distances between area sources and receptors. However, the AERMOD algorithms do check distances between receptors and volume sources because the equations used to calculate concentrations from volume sources are not appropriate at distances very close to the source. This distance is referred to as the exclusion zone, and if a receptor is located within a volume source exclusion zone AERMOD does not perform the concentrations calculation for that

specific source and receptor pair. Of the 1,300 receptors in the model runs, approximately 150 fell within exclusion zones for one or more volume sources.

Sensitivity analysis (modeling) was performed to address the excluded sources for these receptors and determine if any increase in concentrations for the peak receptor would have occurred as a result of including those sources. It should be noted that, for a particular modeled receptor, excluded sources were one to three specific volume sources among a series of volume sources used to represent a roadway or rail line). Consequently, the excluded sources would have a very isolated/localized contribution to receptor concentrations. Notwithstanding, sensitivity analyses were conducted at several key receptor points to determine the potential effects that the excluded sources may have had on the HRA results. These receptor points included the maximum Residential and Occupational Cancer Risk locations for the CEQA impact analysis, as well as the maximum Residential and Occupational Cancer Risk locations for the NEPA impact analysis.

Beginning with the CEQA impact analysis, it was confirmed by reviewing the graphical displays of source and receptor locations that the maximum Occupational Cancer Risk receptor along the southern boundary of the Everport Container Terminal (Figure B3-3, page B3-20 in Appendix B3 of the Draft EIS/EIR) was outside of any source exclusion zones. Therefore, the maximum Occupational Cancer Risk value reported in Table 3.2-26 (page 3.2-68) of the Draft EIS/EIR remains unchanged.

Continuing with the CEQA impact analysis, it was confirmed that the maximum Residential Cancer Risk receptor next to the southbound lanes of the I-110 Freeway between Lomita Boulevard and Pacific Coast Highway, was within the exclusion zones for several volumes that were part of the I-110 freeway source. This location was the only residential site with excluded sources, and was found to have four (4) operational truck source volumes, 4 operational worker vehicle volumes, and 5 construction truck volumes excluded from the Proposed Project calculations. In addition, this location was found to have 5 operational truck source volumes and 5 operational worker vehicle volumes excluded from the CEQA Baseline calculations. (See Figure SCAQMD-7-1) As a note, this receptor is located at the sound wall next to the freeway, yet the residential homes are actually 35 to 40 feet back from the freeway. Therefore, the results from the revised analysis discussed below are very conservative and would have been lower than presented at the actual residences.

To estimate the potential effect of excluded sources on the incremental residential cancer risk, both the Proposed Project and Future CEQA Baseline scenarios were rerun for the peak receptor using a 30-year average diesel particulate matter (DPM) emission rate for all sources. The Proposed Project and Future Baseline scenarios were both run once with no changes in source locations to determine the 30-year average DPM concentration when the nearfield sources were excluded; and once with the I-110 roadway sources modified to prevent the receptor from being within the exclusion zones (see Figure SCAQMD-7-2). The 30-year average DPM concentration was used as a surrogate for residential cancer risk.

1 **Figure SCAQMD-7-1 Excluded Sources from CEQA Residential Cancer Risk Receptor**

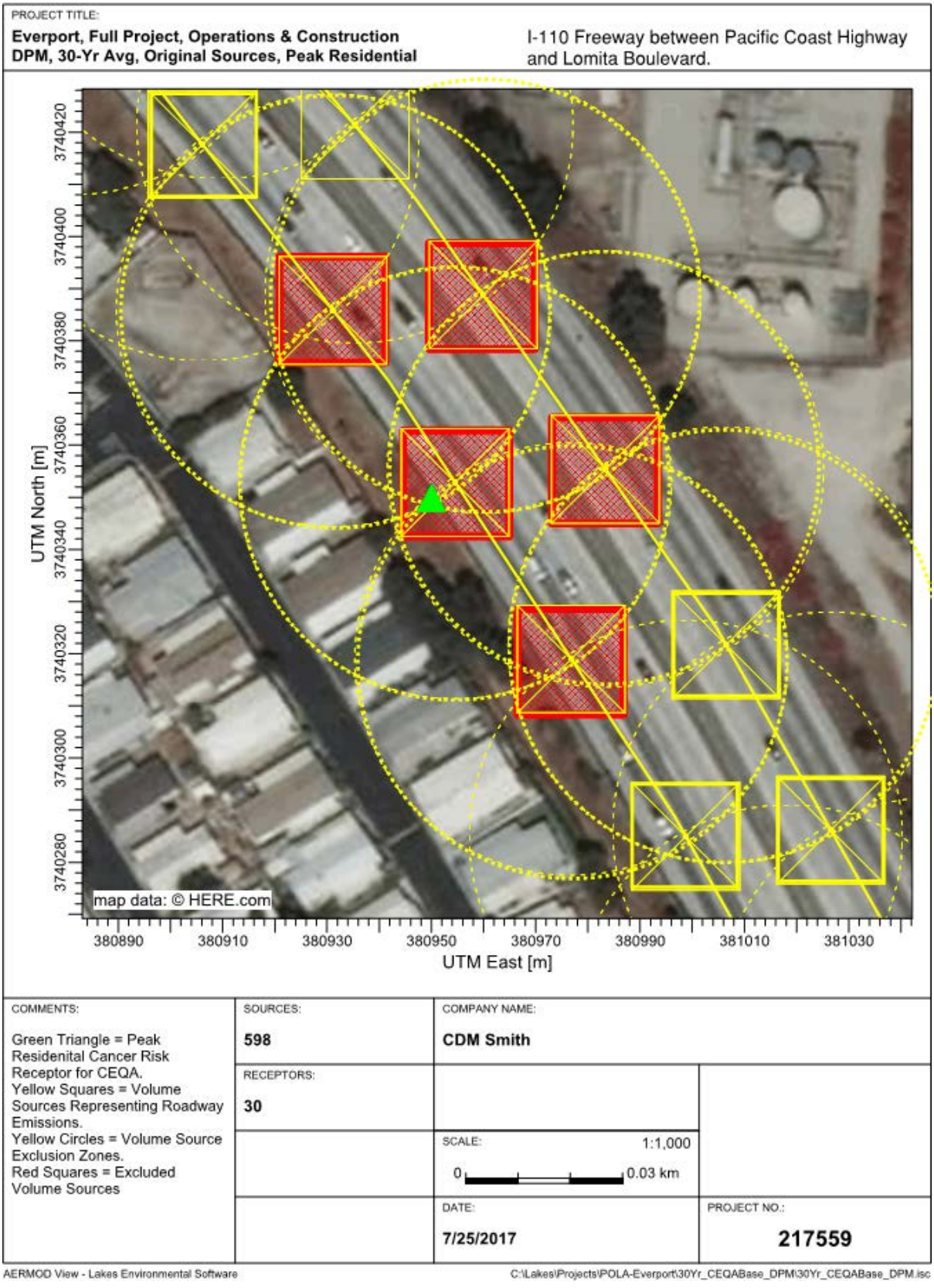
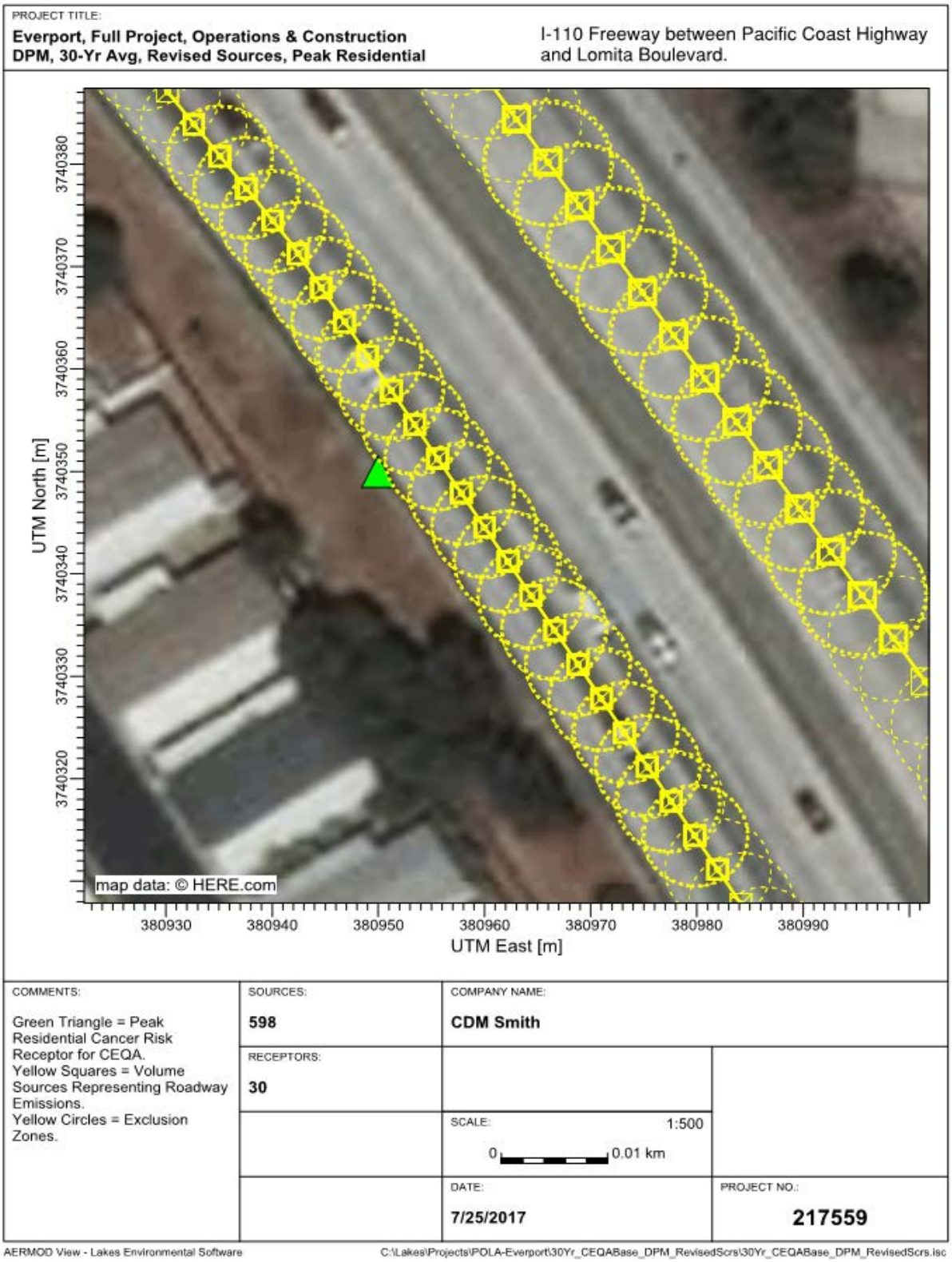


Figure SCAQMD-7-2. CEQA Peak Residential Cancer Risk Receptor with Sources Modified to Remove Exclusions



The Proposed Project 30-year average DPM concentration without the excluded source emissions was 0.01977 micrograms per cubic meter ($\mu g/m^3$), and the Future CEQA Baseline 30-year average DPM concentrations without excluded source emissions was 0.01495 $\mu g/m^3$, resulting in an incremental 30-year average DPM concentration of 0.00482 $\mu g/m^3$ without the excluded source emissions. After rerunning to include the previously excluded sources, the resulting 30-year average DPM concentration was 0.02743 $\mu g/m^3$ for the Proposed Project and 0.02244 $\mu g/m^3$ for the Future CEQA Baseline. The resulting incremental concentration for the maximum Residential Cancer Risk receptor was 0.00498 $\mu g/m^3$ which is only 4 percent higher than the increment before the source adjustment. Therefore, the peak Residential Cancer Risk value would be essentially the same as the value reported in the Draft EIS/EIR for the Unmitigated Future CEQA Increment in Table 3.2-26 (page 3.2-68). The Residential Cancer Risk would remain less than significant and the conclusions found in the Draft EIR/EIS do not change.

The maximum residential cancer risk under NEPA was located in Fish Harbor south of the Everport terminal (Figure B3-5, page B3-25 in Appendix B3 of the Draft EIS/EIR). This location was outside all of the source exclusion zones, therefore, the maximum Residential Cancer Risk value reported in Table 3.2-27 (page 3.2-71) of the Draft EIS/EIR remains unchanged.

The location of the maximum Occupational Cancer Risk receptor under NEPA was on the north side of the Everport Container Terminal, next to the on-dock railyard. This location was found to have several operational rail locomotive volume sources excluded from both the proposed Project and Future CEQA Baseline calculations. Therefore, all of the rail line sources within the Everport Container Terminal boundary were remodeled as area sources. Figure SCAQMD-7-3 presents a graphical representation of the original on-dock rail sources relative to the receptor locations along the northeast terminal boundary, north of the railyard. In addition, many of the roadway sources in the area of the railyard were also modified to prevent the receptors from being within the roadway source exclusion zones. Figure SCAQMD-7-4 presents a graphical representation of the revised area sources in the on-dock railyard and revised roadway sources nearby. Using the 25-year average DPM concentration as a surrogate for occupational cancer risk, both the proposed Project and Future NEPA Baseline concentrations were calculated in AERMOD with the original source configurations and again with the revised source configurations.

The proposed Project 25-year average DPM concentration without the excluded source emissions was 0.797 $\mu g/m^3$, and the Future NEPA Baseline 25-year average DPM concentrations without excluded source emissions was 0.649 $\mu g/m^3$. This resulted in an incremental 25-year average DPM concentration of 0.148 $\mu g/m^3$. The location of this peak receptor is shown on Figure SCAQMD-7-3 as a red triangle. After rerunning with area sources for the on-dock railyard, and modified volume sources for nearby roadways, the resulting peak location moved slightly east, but is still located on the north side of the Everport portion of the on-dock railyard (Figure SCAQMD-7-4). The revised 25-year average DPM concentrations at this location were 1.25 $\mu g/m^3$ for the proposed Project and 1.02 $\mu g/m^3$ for the Future NEPA Baseline. The resulting incremental concentration for the maximum Occupational Cancer Risk receptor was 0.223 $\mu g/m^3$. The Draft EIS/EIR reported the peak Occupational Cancer Risk as 4.6 per million; therefore, the revised peak Occupational Cancer Risk value would be approximately 7 per million for the Unmitigated Future NEPA Increment, which is still less than the significance threshold. Please note that any activity at this location is sporadic and involves many different individuals coming in for short-term periods of time rather than full-time staff working for 25 years and being exposed to DPM. As a result, this revised maximum occupational receptor location is very conservative and not realistic relative to the activity actually occurring at the site.

Figure SCAQMD-7-3. NEPA Occupational Cancer Risk Receptor and Sources Near Railyard

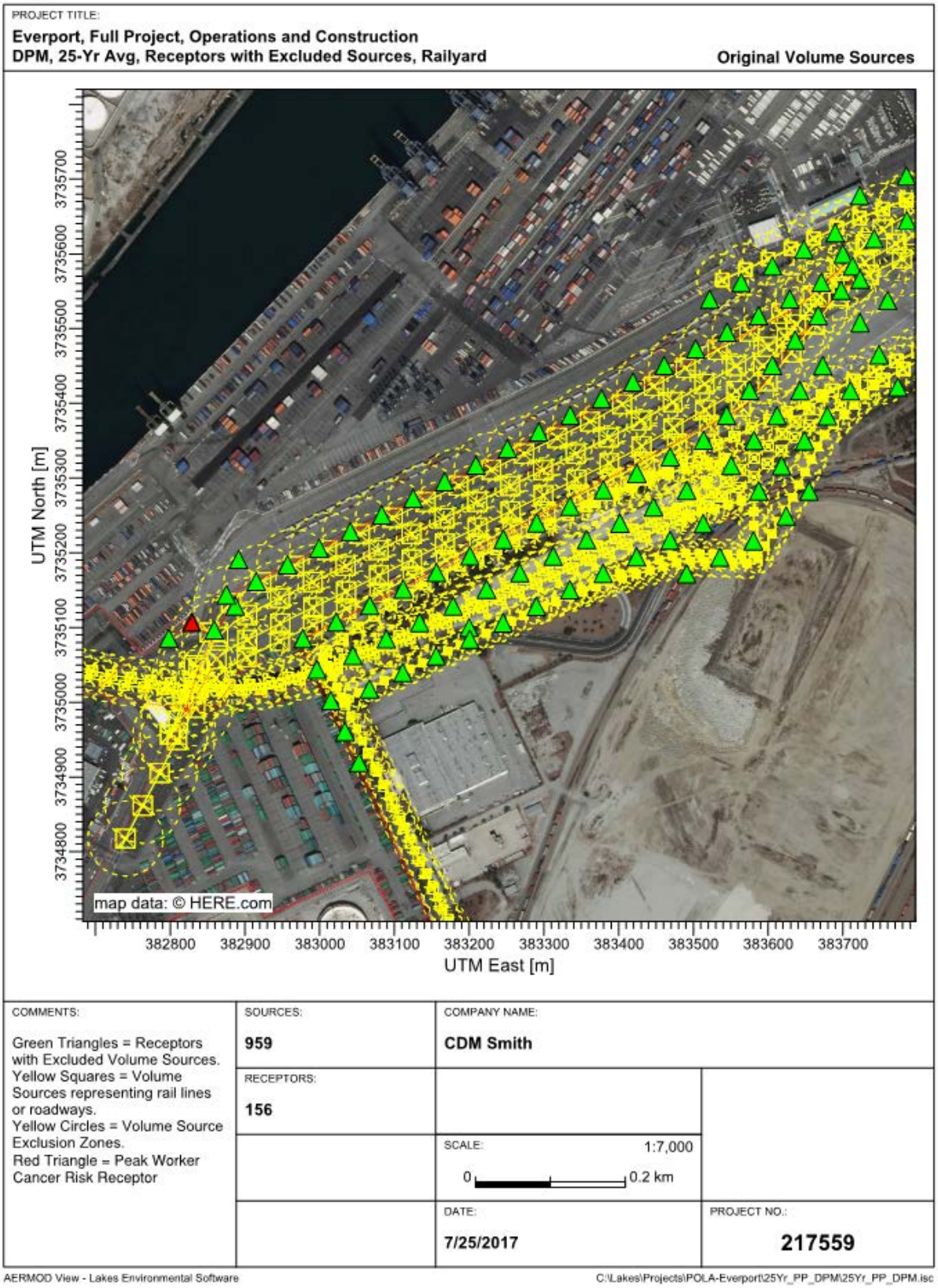
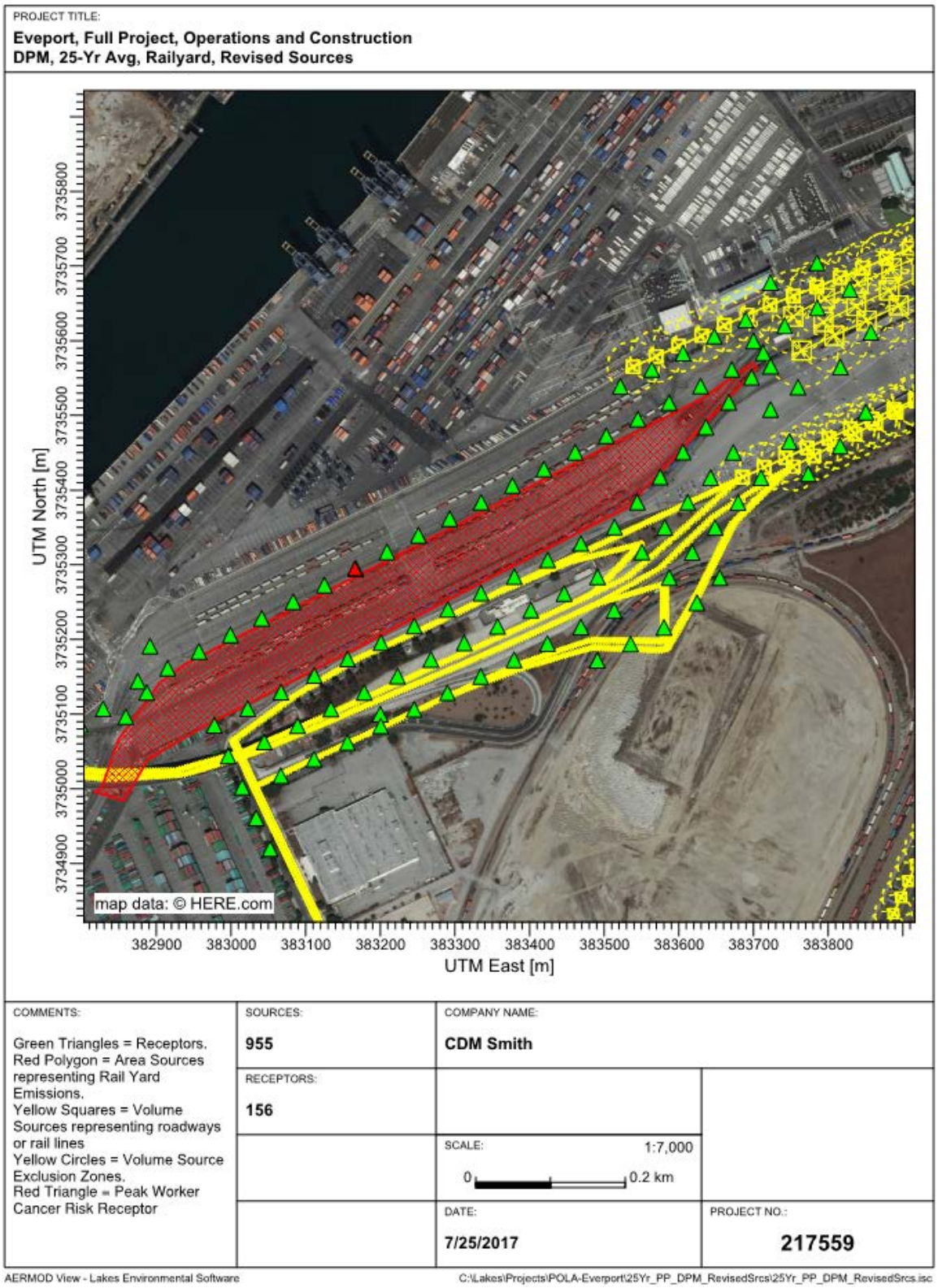


Figure SCAQMD-7-4. NEPA Peak Occupational Cancer Risk Receptors with Sources Modified to Remove Exclusions



Reviewing the Chronic Non-cancer and Acute hazard index results under both CEQA and NEPA (Draft EIS/EIR, Tables 3.2-26 and 3.2-27) indicates that the change in incremental concentrations would have to be more than twice, and often more than 5 to 10 times higher than the modeled increments before a significance threshold would be exceeded. This change would be extremely unlikely; therefore, CEQA and NEPA hazard index results reported in the Draft EIS/EIR represent reasonable estimates of the Proposed Project impacts to non-cancer risks. Note that no sensitive receptors (schools, daycares, hospitals, elderly care facilities) were located within any volume sources exclusion zones.

Response to Comment SCAQMD-8

The comment is noted. The volume source heights for locomotives in transit were set based on the methodology in CARB's Roseville Rail Yard Study (2004). Because volume sources do not have a plume rise algorithm in AERMOD, it was necessary to set the volume source heights equal to the plume heights instead of the locomotive exhaust stack heights. Locomotive exhaust plumes rise to a height above the locomotive stack height because of upward momentum and thermal buoyancy. Differences in atmospheric conditions (specifically, stability) between daytime and nighttime lead to different daytime and nighttime locomotive final plume heights. As a result, different volume source heights were needed for daytime versus nighttime. AERMOD then accounts for atmospheric conditions after the plume is released from the volume source and travels downwind, with no further adjustment to plume rise.

Response to Comment SCAQMD-9

The comment is noted. The meteorological data used in the air dispersion modeling analyses were recorded from September 2006 through August 2007, the first complete 12-month period recorded at all six of the site-specific monitoring stations operated by the Ports of Los Angeles and Long Beach. As discussed in Section 3.1.3 of Appendix B2, a comparison of this time period with the 2009 to 2012 data period showed that the 2006-2007 data period represents typical conditions in the project region and therefore requires no updating to a newer period of record. Furthermore, the use of one year of meteorological data is consistent with USEPA guidelines, which state that "at least one year of site-specific" data are required (USEPA, 2017).

The project air dispersion modeling analyses in the Draft EIS/EIR were performed with the most recent version of AERMOD at the time of the analysis (version 15181, released June 30, 2015), but the meteorological data used in the analyses were processed with AERMET version 12345 (released December 11, 2012). At the time of the analysis, the USEPA had updated AERMET four times since version 12345: (1) version 13350 (released December 16, 2013); (2) version 14134 (released May 14, 2014); (3) version 15181 (released June 30, 2015); and version 16216 (the current version, released August 3, 2016). As part of its ongoing documentation of AERMOD and AERMET, the USEPA performs sensitivity analyses that compare model updates to past model versions to enable users to understand the effects of new model updates. Sensitivity analyses that directly compare AERMET versions 12345 and 16216 are not available. However, analyses are available showing that there are no significant differences between consecutive versions of AERMET. For example, the use of AERMOD version 13350 to simulate the same source types as those in the project analyses (volume or point sources in flat terrain) with AERMET versions 12345 and 13350 resulted in differences in impacts of no greater than 0.5 percent and in some cases none at all between these two versions of AERMET (USEPA Support Center for Regulatory Atmospheric Modeling [SCRAM] website http://www.epa.gov/ttn/scram/dispersion_prefrec.htm#aermod).

Additional analyses from the USEPA SCRAM site also show that use of AERMOD version 14134 to simulate the same source types with AERMET versions 13350 and 14134 resulted in no differences in impacts. The use of AERMOD version 15181 to simulate the same source types with AERMET versions 14134 and 15181 resulted in no differences in impacts. The use of AERMOD version 16216r (the current

version, released January 17, 2017, after the start of the modeling analysis for Everport) to simulate the same source types with AERMET versions 15181 and 16216 resulted in no differences in impacts.

These analyses show that since impacts from (1) AERMET version 12345 are nearly equal to version 13350, (2) AERMET version 13350 are equal to version 14134, (3) AERMET version 14134 are equal to version 15181, and (4) AERMET version 15181 are equal to 16216, then (5) AERMET version 12345 are nearly equal to 16216. Therefore, use of AERMET version 16216 instead of version 12345 in the project dispersion modeling analyses would not produce a substantial difference in impacts compared to those presented in the Draft EIS/EIR.

The Terminal Island Treatment Plant (TITP) monitoring station was the preferred site for meteorological data for this Draft EIS/EIR because it is part of the Port's site-specific monitoring network and is located just east of the Everport Container Terminal, less than 0.5 miles from the center of the terminal. The Port appreciates the offer to use AERMOD-ready meteorological data processed by the SCAQMD. However, since these data were collected several miles from the Port area, they are not as representative of conditions within the project region as the Port's data.

Response to Comment SCAQMD-10

The comment is noted. Neither CARB nor AQMD have established a methodology or significance threshold for evaluating PM2.5 mortality and morbidity in a CEQA document. In its response to the Notice of Preparation of the Draft EIS/EIR, SCAQMD did not reference any requirement for conducting a mortality and morbidity analysis for the proposed Project nor provide any suggestion as to how such an analysis would be undertaken (CARB did not respond to the NOP). Moreover, CARB's latest 2010 document, which estimates premature deaths associated with PM2.5, does not provide any guidance as to whether such an analysis should be prepared for a project level CEQA assessment, nor does it explain how such an analysis would be conducted. In the absence of any guidance, the Port followed the methodology described in Section 3.2.4.1 and Impact AQ-7 of the Draft EIS/EIR.

Mortality and morbidity studies examining health effects of exposure to fine particulate matter have been used by the USEPA and CARB to set the NAAQS and CAAQS, respectively, and by SCAQMD to set the CEQA significant concentration thresholds for particulate matter. For this reason, a comparison of the Project's modeled PM2.5 concentrations to the SCAQMD's CEQA significance threshold for PM2.5, which is more stringent than the NAAQS and CAAQS, implicitly accounts for mortality and morbidity effects on sensitive receptors. Therefore, if project impacts were found to be greater than the SCAQMD's CEQA significance threshold for PM2.5 concentrations at residential receptors, the estimate of mortality and morbidity in the areas above the threshold would be conducted to better describe the effect of the significant impact.

To determine whether a detailed mortality and morbidity analysis was necessary for the proposed Project, the Port compared the ambient PM2.5 impacts predicted for proposed Project operation to the 2.5 ug/m3 24-hour threshold set by SCAQMD. While peak impacts on Port property adjacent to the Everport vehicle entrance gate exceeded the PM2.5 threshold, no residential receptors (including sensitive receptors) were found that exceeded the threshold.

Response to Comment SCAQMD-11

The comment is noted. Please see Response to Comment CARB-13 regarding the suggestion to review the tenant equipment and technology feasibility every two years rather than five years. It should be noted; however, that the applicant/tenant has agreed to working with LAHD any time a piece of on-site equipment needs to be replaced regardless of how much time as gone by since the previous CHE was turned over. This

indicates the facility's willingness to work with LAHD to ensure that the cleanest technology is employed at the terminal wherever possible. Please also refer to Master Response 2: Zero Emission Technologies.

Response to Comment SCAQMD-12

Mitigation measures MM AQ-2 and MM AQ-3 will be revised for the Final EIS/EIR as suggested in the comment. Please refer to Chapter 3, Modifications to the Draft EIS/EIR of the Final EIS/EIR. Regarding lease measure LM AQ-1, please refer to Response to Comment CARB-13, Master Response 1: Feasible Mitigation – Guidance and Applicability, and Master Response 2: Zero-Emission Technologies.

Response to Comment SCAQMD-13

The comment is noted. General conformity determinations for both 2018 and 2019 were calculated and are available in Appendix B1 of the Draft EIS/EIR toward the bottom of Table 9 (pages 74 and 89 of the Appendix B1 pdf). For the readers' convenience, the results for 2019 are repeated below and do not exceed general conformity *de minimis* threshold for any criteria pollutant.

2019 Construction Emissions (tons per year) Compared to General Conformity de minimis Thresholds						
Year	**VOC**	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
Construction Year 2019	0.35	9.01	0.93	0.3	0.19	0.17
General Conformity *de minimis* level	10	10	100	--	100	100
Exceeds *de minimis* level?	No	No	No	NA	No	No

Notes:

VOC – volatile organic compounds, NOx – nitrogen oxides, CO – carbon monoxide, SO_2 – sulfur dioxide, and PM10/2.5 – particulate matter

2.3.5 Organization Comments

From:	Johntommy Rosas
To:	Stevens, Theresa CIV USARMY CESPL (US); McDonald, A Meg CIV USARMY CESPL (US); JOHNTOMMY ROSAS
Subject:	[Non-DoD Source] Re: Notice of Availability of a Draft EIS/EIR for Berths 226-236 [Everport] Container Terminal Improvements Project
Date:	Thursday, April 20, 2017 5:28:45 PM

Thanks -
I will request sec 106 NHPA tribal consultation process as a consulting party,
especially on our tribal resources affected by this proposed project.
thanks jt

JTR-1

2.3.5.1 Tongva Ancestral Territorial Tribal Nation – John Tommy Rosas (JTR)

Response to Comment JTR-1

The comment is noted. As described on page 3.4-54 of the Draft EIS/EIR, Assembly Bill (AB) 52, which establishes a formal consultation process for California tribes as part of CEQA, became law on January 1, 2015. The Notice of Intent/Notice of Preparation of the Draft EIS/EIR associated with the proposed Project was prior to the law being in effect (October 2014). However, as detailed beginning on page 3.4-48 of the Draft EIS/EIR, both the LAHD and USACE have initiated, and the USACE has completed, Native American consultation for the Project in compliance with Section 106 of the National Historic Preservation Act.

Tisopulos, Tara

From:	Tom Williams <ctwilliams2012@yahoo.com>
Sent:	Monday, June 05, 2017 1:19 PM
To:	theresa.stevens@usace.army.mil; Ceqacomments
Cc:	christopher.cannon@lacity.org; christopher.cannon@lporta.org; Jim Stewart; Steve Wicke; Paul Ferrazzi
Subject:	Berths 226-236 [Everport] Container Terminal Improvements Project Comments

DATE: June 5, 2017

TO: **US Army Corps of Engineers,** LA District, Reg.Div., Ventura Field Office
ATTN: Theresa Stevens, Ph.D. 2151 Alessandro Drive, Suite 110 Ventura CA 93001
theresa.stevens@usace.army.mil
Port of Los Angeles Christopher Cannon Dir. of Envir. Mngmt.
P.O. Box 151 San Pedro, CA 90733-0151
ceqacomments@portla.org
christopher.cannon@lacity.org - christopher.cannon@lporta.org

CC:

FROM: Dr. Tom Williams, Senior Technical Advisor
Citizens Coalition for A Safe Community 4117 Barrett Rd, LA, CA 90032-1712
323-528-9682 ctwilliams2012@yahoo.com

SUBJECT/ PROJECT: Berths 226-236 [Everport] Container Terminal Improvements Project Draft EIS/EIR SCH #2014101050 April 2017
RE: Comments on Draft EIS/EIR SCH #2014101050 and CEQA/NEPA Considerations

After lengthy review of the various documents related and referenced in the circulated DEIR/DEIS, I request that the Harbor Department/Port of Los Angeles withdraw all current documents, review comments, revise/quantify, and prepare a complete and adequate Environmental Impact Report and Statement with a fuller range of maritime and transportation alternatives and a draft mitigation monitoring and report program. This request is based on the many inadequacies and incompleteness of the DEIR/S. Continuation with the current documents will lead to prolonged reviews and further actions. CCSC-1

I have reviewed and find the DEIR/S incomplete and inadequate based on summary remarks below.

Current documents are totally unsuitable, incomplete, and inadequate for public review and meaningful comments due to lack of clarity in assignment of "impacts".
General Comments:

Lack of use of historic/1923-1928 and later aerial photos and lack of public access to referenced later photos and their value to description/assessment of subsurface historic resources and hazards/haz.matls.; CCSC-2

Lack of consideration for Pleistocene archaeological and paleontological resources during deepening and excavation of Pleistocene deposits; CCSC-3

Reassignment of typical hazardous materials to groundwater and soils; CCSC-4

Inclusion of "terrorist acts" as part of "Hazards..." without setting and assessment in objective and numerical presentation and assessment; CCSC-5

Although available records locate >200 earthquakes within two miles of the site geology and seismicity were eliminated from DEIR/S as long as project complies with undefined and "future" consideration without public review of compliance with engineering requirements; CCSC-6

Container forecasts: Lack of use or even reference to "Mercator and Oxford, 2016" forecasts for the San Pedro Ports voids all presentations, assessment, and mitigation regarding projected maritime traffic and the project's participation and related air quality. This is also related to the railroad alternatives as the Alameda Corridor Transportation Authority. CCSC-7

2.3.5.2 Citizens Coalition for a Safe Community (CCSC)

Response to Comment CCSC-1

The comment is noted. The LAHD and USACE respectfully disagree that the Draft EIS/EIR is incomplete and inadequate, should be withdrawn, and revised with a fuller range of maritime and transportation alternatives. The Draft EIS/EIR included a detailed/co-equal analysis of five alternatives (the no project and four build alternatives, see Section 2.9 in Chapter 2 of the Draft EIS/EIR) to the proposed Project, with various maritime and transportation elements. As with other LAHD EIR's, the Final EIS/EIR for the proposed Project will include the mitigation monitoring and reporting program (MMRP), which includes mitigation measures to reduce the potential environmental effects of the proposed Project. The MMRP will be provided and adopted per CEQA Guidelines Section 15091(d) and Section 15097(a).

The Draft EIS/EIR includes several features that provide clarity regarding the potential impacts associated with the proposed Project. Chapters and each resource section begin with a summary of the analysis, and each resource section concludes with a table that summarizes the impacts, mitigation measures and residual impacts associated with the proposed Project and each alternative. In addition, the Executive Summary also includes an extensive table (Table ES-3) which summarizes the potential significant impacts and mitigation for the proposed Project and alternatives for all resource areas.

The comments do not identify any specific deficiencies in the Draft EIS/EIR; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)). The Draft EIS/EIR contains the sufficient detail required by NEPA and CEQA (State CEQA Guidelines Section 15151 and 40 CFR 1502.2, 1502.24).

Response to Comment CCSC-2

The comment is noted. The Draft EIS/EIR included a figure (Figure 3.4-2 in the Cultural Resources, Section 3.4) that shows the development of the Project site over time. The historical topographical maps used in Figure 3.4-2 include maps from 1898, 1925, 1964, 1981, and 2012; therefore, historic maps from earlier and later than 1923-1928 were included within the Draft EIS/EIR. These maps were used in determining hazardous materials and cultural resource impacts associated with the Project site development over time. Further, historic photos of the project site and area, some pre-dating 1923, are included in Appendix D, Cultural Resources Evaluation, of the Draft EIS/EIR.

Response to Comment CCSC-3

The comment is noted. Section 3.4, Cultural Resources of the Draft EIS/EIR, includes an analysis of archaeological and paleontological resources in addition to the historic/built environment (architectural resources). The Project site has been subjected to major soil disturbance over the years (Figure 3.4-2). As detailed throughout Section 3.4, although the Port area is underlain with potential fossil-bearing geologic units, sediments that immediately underlie the Project area consist of imported or modern fill material placed in the early twentieth century. As shown on Figure 3.4-3, Geologic Map, no Pleistocene deposits are associated with the Project site.

Response to Comment CCSC-4

The comment is noted. Section 3.7, Groundwater and Soils, of the Draft EIS/EIR evaluates groundwater and soil conditions in the proposed Project area and assesses how the construction and operation of the proposed Project or one of its alternatives would affect or be affected by the potential to encounter existing soil and groundwater contamination. As described in Section 3.7, the NOI/NOP (Appendix A of this Draft EIS/EIR) determined that potential impacts related to routine transport, use, or disposal of hazardous materials and hazardous emissions would be less than significant. As such, those impacts were not

discussed in the Draft EIS/EIR. The commenter did not identify any specific deficiencies in the Draft EIS/EIR; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

Response to Comment CCSC-5

The comment is noted. Section 3.8, Hazards and Hazardous Materials, of the Draft EIS/EIR analyzes the effects of the proposed Project and alternatives on increasing the risk probability and criticality of hazardous spills or releases and risk of upset due to terrorism. Three are no known numerical data associated with potential terrorist attacks and container terminals. As detailed in Section 3.8, there are limited data available to indicate the likelihood of a terrorist attack aimed at the Port or the Project site; therefore, the probability component of the analysis contains a considerable amount of uncertainty. The likelihood of such an attack would be based on the desire to cause harm to the Port and/or the desire to use a container as a vehicle to hide a device for use at a different location. The probability of an attack would have no relationship to a specific terminal or project-related throughput.

Response to Comment CCSC-6

The comment is noted. The commenter is correct that the NOI/NOP (Appendix A of the Draft EIS/EIR), which was released for public review in October 2014, determined that potential impacts related to geology would be less than significant. As such, those impacts were not discussed in the Draft EIS/EIR. As detailed in Checklist Item VI.a.(i) in Appendix A of the Draft EIS/EIR, the proposed Project features would not cause or accelerate geologic hazards. Wharf and terminal improvements would be conducted in accordance with LAHD and City of Los Angeles seismic design and engineering criteria, which includes recommendations in a geotechnical report prepared as part of the design process, to minimize potential risks in the event of seismically-induced geologic hazards. The design would incorporate measures pertaining to temporary construction conditions, such as maximum temporary slope gradient. Therefore, through compliance with appropriate engineering standards and building codes, the impacts were considered less than significant. As the commenter did not provide comments on the NOI/NOP, and did not identify any specific deficiencies in the Draft EIS/EIR, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

Response to Comment CCSC-7

The comment is noted. At the time of the NOI/NOP (2014), which represents the CEQA baseline, the 2009 forecast was the information available on long-term containerized cargo growth at the Ports of Los Angeles and Long Beach.

Section 1.2.3.1 (Cargo Demand Forecast) of the Draft EIS/EIR summarizes the unconstrained cargo forecast in the 2009 Cargo Forecast for the Port through 2030 (Tioga and HIS Global, 2009), and extends the horizon to 2035. When considering future throughput, the Port considers both the unconstrained projection (future cargo demand if physical capacity does not constrain throughput) and the projected future physical capacity of the Port terminals. An unconstrained forecast merely represents the estimated upper bounds of future throughput without consideration of physical limitations. As discussed in the Draft EIS/EIR, the 2009 forecast projected unconstrained throughput to be 34,600,000 TEUs in 2030, which was extended to 2035. The 2016 cargo forecast (Mercator, 2016) predicts that unconstrained cargo demand will reach 34.3 million TEUs in 2035 (which is less that but very similar to the 2009 forecast for 2030). When evaluating impacts of container terminal projects, the Port uses the maximum physical capacities of the terminals based on the terminals' berth and backland capacities. As described in Section 1.2.3.2 (Container Terminal Capacity) of the Draft EIS/EIR, future throughput at the San Pedro Bay Ports will be constrained at 37,367,000 TEUs, which is greater than both the 2009 and 2016 unconstrained cargo forecasts. The

throughput projections for the proposed Project and for the San Pedro Bay Ports as a whole, are based on the Ports' physical throughput capacity, rather than the lower unconstrained cargo forecasts, in order to evaluate reasonable worst-case conditions. Thus, because the Draft EIS/EIR evaluate a reasonable worst case future throughput that is somewhat greater than either the 2009 or the 2016 unconstrained forecasts, the impact evaluations in the Draft EIS/EIR and applicable mitigation measures are valid.

LAHD, APP#131015-136 (TT)

Coalition For A Safe Environment

1601 N. Wilmington Blvd., Ste. B, Wilmington, CA 90744
jnm4ej@yahoo.com jesse@cfasecares.org 424-264-5959 310-590-0177

June 5, 2017

City of Los Angeles Harbor Department
Christopher Cannon, Director
Environmental Management Division
425 S. Palos Verde St., San Pedro, CA 90733-0151
ccannon@portla.org
310-732-3675 Office
310-547-4643 Fax
ceqacomments@portla.org

U.S. Army Corps of Engineers
Los Angeles District, Regulatory Division
Ventura Field Office
ATTN: Theresa Stevens, Ph.D.
2151 Alessandro Drive, Suite 110
Ventura CA 93001
805-585-2146
Public Affairs Office
213-452-3920
Theresa.stevens@usace.army.mil

Re: Berths 226-236 [Everport] Container Terminal Improvements Project April 2017 Draft Environmental Impact Report (DEIR)/Draft Environmental Impact Statement (DEIS) SCH No. 2014101050, APP No. 131015-136, SPL-2013-00756-TS

Su: Submission of Public Comments Regarding The Berths 226-236 Everport Draft EIR/Draft EIS

The Coalition For A Safe Environment (CFASE) and et all undersigned organizations and individuals wish to submit the following public comments on the Berths 226-236 [Everport] Container Terminal Improvements Project Draft Environmental Impact Report (DEIR)/Draft Environmental Impact Statement (DEIS).

1. **USACE Purpose & Need/CEQA Project Objectives Are Not Accurate**

   It is stated that the Purpose, Need and Objectives are to accommodate the project throughput and fleet mix of larger container ships (up to 16,000 TEU's) which may not be entirely accurate and true. Evergreen has no orders pending for 16,000 TEU ships. The current Evergreen ship orders are for 14,000 TEU and 18,000 TEU ships. There are currently 5 cranes which can accommodate 18,000 TEU ships and the 5 new cranes to be purchased can accommodate 18,000 TEU's. CFSE-1

We do not believe that POLA will refuse to allow future 18,000 TEU ships to arrive in the future. The additional negative impacts of larger 18,000 TEU ships need to be identified, assessed and mitigated. See Public Comments Table of Contents and Attachments:

A. Evergreen Ship Information

   a. List of EVERGREEN Ships
   b. Evergreen Line To Charter Ten 14,000 TEU Vessels
   c. Evergreen to Charter Eleven 18,000 TEU Vessels
   d. Reference Table ES-1 Everport Container Terminal Crane Specifications
   e. Freight Efficiency Strategies

CFSE-1 cont.

B. CFASE Requests

   a. We request that a restriction be placed into all new and future leases that will prohibit 18,000 TEU ships from docking at the Port of Los Angeles.
   b. We request that the a new Draft EIR be prepared and re-circulated that will include all Identified Negative Impacts, an Increased Negative Impacts Assessment and Mitigation Measures for addressing larger 18,000 TEU ships negative impacts to less than significant.
   c. We request that the a new Draft EIR be prepared and re-circulated that will include a plan and annual schedule for contracting/purchasing additional trucks, contracting/purchasing additional chassis, acquisition of additional truck storage/staging areas and container storage yards to prevent Truck and Facility Shortages or Unavailability.
   d. We request that the a new Draft EIR be prepared and re-circulated that will include a plan and annual schedule for recruitment of drivers and training of drivers to prevent Driver Shortages.

2. Ground Traffic Transportation Unavoidable Significant Impacts Determination

We disagree with your determination because there are Alternatives and Feasible Mitigation Measures that can reduce significant impacts that you are not including in the project or as proposed Mitigation Measures. In addition, your DEIR identified impacts are under-identified and under-estimated. Your inclusion, identification and use of the term Peel-Off Yards is not acceptable.

CFSE-2

   a. The term Peel-Off Yards is unacceptable because it is not a standard industry term and from our Environmental Justice perspective is an attempt to hide the real truth that is actually an "off-Port Truck/Container Staging Area" in the bordering harbor communities. Most likely to be in Wilmington. There will be additional truck traffic to these locations, causing additional increased traffic congestion, increased air pollution, increased greenhouse gasses, increased noise, increased ground and street contamination, diversion of city services when there are truck accidents, increased public infrastructure damage, increased public health and safety impacts. The DEIR failed to disclose the locations of the Peel-Off Yards and how many trucks trips and containers will go to each.

CFSE-3

   b. The DEIR fails to include a Mitigation Measure to mandate the increased use of the Alameda Corridor to reduce ground traffic congestion.

CFSE-4

c. The DEIR fails to include an assessment of Alternative Rail Transportation Technologies as a Mitigation Measure which are faster, more efficient and can significantly increase throughput such as a Maglev Train. American MagLev Technologies, Inc. has proposed to the Port of Los Angeles, Port of Long Beach, South Coast AQMD and the Southern California Association of Governments a feasible container transport Maglev Train System. CFSE-5

   EMMI Logistics Solutions and American MagLev Technology have designed a state-of-the-art goods movement transportation system that can transport up to 8,000 containers a day and more than 3 times the speed of a traditional diesel locomotives. This technology does not require having to accumulate 250-300 train cars before it can travel to its destinations.

d. The increased velocity and through-put would therefore not require the construction of additional backlands, since the traditional long queue times would be eliminated. This high speed transportation logistics system would decrease the need for 1,000's of additional diesel air polluting trucks trips a day to carry cargo since higher volumes could be transported by the Maglev System. CFASE has requested numerous times that POLA sponsor a Pilot Study and again requests a Maglev Train Pilot Study and is supported by the public and Environmental Justice Communities. CFSE-6

e. The DEIR fails to identify, assess and mitigate all truck, container and chassis negative impacts from Truck Points of Origin to all Port and Tenant destinations. The number of 7,028 average daily truck trips is significantly underestimated because they do not include all truck points of origin locations, port and tenant travel destinations. These negative impacts include but are not limited to: increased traffic congestion, increased air pollution, increased greenhouse gasses, increased noise, increased ground and street contamination, diversion of city services when there are truck accidents, increased public infrastructure damage, increased public health and safety impacts. These origins and destinations include as a minimum:

- Truck Point of Origin. Throughout Los Angeles and Orange Counties.
- On/Off Tidelands Property Truck Container/Flat Bed Inspection Facilities. CFSE-7
- On/Off Tidelands Property Container Storage Yards, Maintenance & Repair Facilities.
- On/Off Tidelands Property Container/Flat Bed Chassis Storage Yards, Maintenance & Repair Facilities.
- On/Off Tidelands Property Chassis 40' to 53' Modification, Cutting, Welding & Painting Facilities
- On/Off Tidelands Property TRU/Genset Storage Yards, Maintenance & Repair Facilities.
- On/Off Tidelands Property Truck Storage Yards, Staging, Maintenance & Repair Facilities.
- On/Off Tidelands Property Yard Tractor Storage Yards, Maintenance & Repair Facilities.
- On/Off Tidelands Property Container Fumigation Facilities.
- On/Off Tidelands Property Container Transloading Facilities.
- On/Off Tidelands Property Truck Fueling Facilities: Diesel, Natural CNG, LNG, Hydrogen.
- On/Off Tidelands Property Truck Yard Tractor Fueling Facilities: Diesel, Natural CNG, LNG, Hydrogen.
- On/Off Tidelands Property Truck Electrical Charging Stations.
- On/Off Tidelands Property Truck Yard Tractor Fueling Facilities.
- On/Off Tidelands Property Peel-Off Yards.

CFASE has conducted a survey of Container Storage Yards in Wilmington and has identified 117 locations. See Public Comments Table of Contents and Attachments: CFSE-7 cont.

f. The DEIR fails to include dedicated freeway and highway truck lanes are also an Alternative Mitigation Measure of which the Port has not considered, assessed, proposed or sponsored and is supported by the public and Environmental Justice Communities. CFSE-8

g. The DEIR fails to include the building of a dedicated underground truck tunnel from the Ports to various rail transportation yards is also an Alternative Mitigation Measure of which the Port has not considered, assessed, proposed or sponsored and is supported by the public and Environmental Justice Communities. CFSE-9

h. The DEIR fails to include the use of multi-story parking structures On-Port Property to maximize space such as in Import Car Parking Lots and in Industrial Zones Areas which is an Alternative Mitigation Measure of which the Port has not considered, assessed, proposed or sponsored and is supported by the public and Environmental Justice Communities. CFSE-10

3. Air Quality & Meteorology Unavoidable Significant Impacts Determination

We disagree with your determination because there are numerous feasible technologies that can reduce air quality significant impacts that you are not including in the project or as proposed Mitigation Measures. These include Zero Emission Technologies, Near Zero Emission Technologies, Best Available Control Technologies (BACT) and Emission Capture Technologies. All referenced technologies are commercially available today and can be ordered with delivery within one year depending on the quantity ordered. CFSE-11

The DEIR does not identify, assess or mitigate all Greenhouse Gas Impacts on Climate Change and Public Health as identified in these public comments and referenced CFASE Bibliographies. See Public Comments Table of Contents and Attachments. CFSE-12

LM AQ-1 and LM AQ-2 are unacceptable because the technologies identified in these public comments are commercially available today. The FEIR should include an implementation, purchase and delivery schedule. CFSE-13

The number of 7,028 average daily truck trips and air emissions during the peak month and all other non-peak months is significantly underestimated because they do not include all truck points of origin locations, port and tenant travel destinations as identified in 2.e. CFSE-14

A. Zero Emission Class 8 Electric Trucks

There are currently six (6) Zero Emission Class 8 Electric Trucks available. See Public Comments Table of Contents and Attachments:

a. TransPower - Electric Class 8 Truck - ElecTruck
b. BYD - Electric Class 8 Truck - 8TT/T9
c. US Hybrid - Electric Class 8 Truck - eTruck
d. US Hybird - Electric Class 8 Truck – H2Truck
e. Toyota - Electric Class 8 Truck - Hydrogen Fuel Cell
f. Nikola - Nikola One - Electric Class 8 Truck

CFSE-15

B. Zero Emission Class 8 Electric Tractors

There are currently four (4) Zero Emission Class 8 Electric Tractors available. See Public Comments Table of Contents and Attachments:

a. TransPower - Electric Class 8 Electric Yard Tractor
b. Orange EV - Electric Class 8 Electric Yard Tractor - T-Series
c. BYD - Electric Class 8 Tractor - 8Y
d. Terberg - Electric Class 8 Yard Tractor - Terberg YT202-EV

C. Near Zero Emission Class 8 Electric Trucks

There are currently fourteen (14) Near Zero Emission Class 8 Electric Tractors available. See Public Comments Table of Contents and Attachments:

a. TransPower - Class 8 Truck - Natural Gas Plug-In Hybrid Drive System
b. Peterbilt - Class 8 Truck - Model 579 ISX 12 G – LNG
c. Peterbilt - Class 8 Truck - Model 567 ISX 12 G – LNG
d. Freightliner - Class 8 Truck - Cascadia 113 Natural Gas - CNG Fuel Tank
e. Freightliner - Class 8 Truck - Cascadia 113 Natural Gas - LNG Fuel Tank
f. Freightliner - Class 8 Truck - M2 112 Natural Gas – CNG
g. Freightliner - Class 8 Truck - M2 112 Natural Gas – LNG
h. Volvo - Class 8 Truck - Model VNM 200 ISL G - Natural Gas
i. Volvo - Class 8 Truck - Models VNL 300 ISX12 G - Natural Gas
j. Volvo - Class 8 Truck - Models VNL 670 ISX12 G - Natural Gas
k. TranStar - Class 8 Truck - ISL G - CNG
l. Mack - Class 8 Truck - Pinnacle ISX12 G – CNG
m. Mack - Class 8 Truck - Pinnacle ISX12 G – LNG
n. Mack - Class 8 Truck - Pinnacle ISX12 G - RNG

CFSE-15 cont.

D. Near Zero Emission Class 8 Electric Tractors

There are currently eleven (11) Near Zero Emission Class 8 Electric Tractors available. See Public Comments Table of Contents and Attachments:

a. Kenworth - Class 8 Tractor - T680 ISL G
b. Kenworth - Class 8 Tractor - T880 ISL G NZ - Near Zero – CNG
c. Kalmar T 2 - 4x2 On Road Terminal Tractor ISL G - CNG
d. Kalmar T 2 - 4x2 On Road Terminal Tractor ISL G - LNG
e. Kalmar T 2 - 4x2 On Road Terminal Tractor ISL G - RNG
f. Kalmar T 2 - 4x2 Off Road Terminal Tractor ISL G - CNG
g. Kalmar T 2 - 4x2 Off Road Terminal Tractor ISL G - LNG
h. Kalmar T 2 - 4x2 Off Road Terminal Tractor ISL G - RNG
i. Autocar - ACTT - 4x2 DOT/EPA Terminal Tractor ISL G - CNG
j. Autocar - ACTT - 4x2 DOT/EPA Terminal Tractor ISL G - LNG
k. Capacity - Sabre 4x2 DOT Terminal Tractor ISL G - CNG

E. Ship Emission Capture Technologies

There is currently only one (1) ship emissions capture technology company that can service the Everport shipping line. See Public Comments Table of Contents and Attachments:

a. Advanced Environmental Group(AEG)/ACTI- Advanced Maritime Emissions Control Systems (AMECS) Fact Sheet
b. Introduction to AMECS
c. AMECS / Shore Power Cost Comparison
d. California Air Resources Board - Letter

CFSE-15 cont.

4. Green House Gas Emissions Unavoidable Significant Impacts Determination

We disagree with your determination because there are numerous feasible technologies that can reduce Greenhouse Gases significant impacts that you are not including in the project or as proposed Mitigation Measures. These include Zero Emission Technologies, Near Zero Emission Technologies, Best Available Control Technologies (BACT) and Emission Capture Technologies. All referenced technologies are commercially available today and can be ordered with delivery within one year depending on the quantity ordered.

CFSE-16

The DEIR does not identify, assess or mitigate all Greenhouse Gas Impacts on Climate Change and Public Health as identified in these public comments and referenced CFASE Bibliographies. See Public Comments Table of Contents and Attachments.

CFSE-17

LM AQ-1 and LM AQ-2 are unacceptable because the technologies identified in these public comments are commercially available today. The FEIR should include an implementation, purchase and delivery schedule.

CFSE-18

LM GHG-1 is unacceptable because the identified Greenhouse Gas amounts are significantly underestimated as identified in these public comments. We object that any GHG funds be used to purchase credits from an approved GHG offset registry, we demand that all funds be used to support mitigation projects on-port property and off-port property which impact bordering port Environmental Justice Communities, transportation corridor and warehouse/distribution communities. We do not support any Carbon Offset Fund MOU Agreements especially with the California Air Resources Board who has historically cut back-room deals which negatively and significantly impact Environmental justice Community's. We do not approve of the Port arbitrarily setting a cap for the Carbon Offset Fund to $ 250,000 when the cost of credits or environmental impacts mitigation may be significantly larger. If the Tenant disagrees to fund GHG mitigation then the Everport Project and EIR are cancelled.

CFSE-19

The number of 7,028 average daily truck trips and greenhouse gas emissions during the peak month and all other non-peak months is significantly underestimated because they do not include all truck points of origin locations, port and tenant travel destinations as identified in 2.e.

CFSE-20

A. Zero Emission Class 8 Electric Trucks

There are currently six (6) Zero Emission Class 8 Electric Trucks available. See Public Comments Table of Contents and Attachments:

g. TransPower - Electric Class 8 Truck - ElecTruck
h. BYD - Electric Class 8 Truck - 8TT/T9
i. US Hybrid - Electric Class 8 Truck - eTruck
j. US Hybird - Electric Class 8 Truck – H2Truck

CFSE-21

k. Toyota - Electric Class 8 Truck - Hydrogen Fuel Cell
l. Nikola - Nikola One - Electric Class 8 Truck

B. Zero Emission Class 8 Electric Tractors

There are currently four (4) Zero Emission Class 8 Electric Tractors available. See Public Comments Table of Contents and Attachments:

e. TransPower - Electric Class 8 Electric Yard Tractor
f. Orange EV - Electric Class 8 Electric Yard Tractor - T-Series
g. BYD - Electric Class 8 Tractor - 8Y
h. Terberg - Electric Class 8 Yard Tractor - Terberg YT202-EV

C. Near Zero Emission Class 8 Electric Trucks

There are currently fourteen (14) Near Zero Emission Class 8 Electric Tractors available. See Public Comments Table of Contents and Attachments:

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q. Peterbilt - Class 8 Truck - Model 567 ISX 12 G – LNG
r. Freightliner - Class 8 Truck - Cascadia 113 Natural Gas - CNG Fuel Tank
s. Freightliner - Class 8 Truck - Cascadia 113 Natural Gas - LNG Fuel Tank
t. Freightliner - Class 8 Truck - M2 112 Natural Gas – CNG
u. Freightliner - Class 8 Truck - M2 112 Natural Gas – LNG
v. Volvo - Class 8 Truck - Model VNM 200 ISL G - Natural Gas
w. Volvo - Class 8 Truck - Models VNL 300 ISX12 G - Natural Gas
x. Volvo - Class 8 Truck - Models VNL 670 ISX12 G - Natural Gas
y. TranStar - Class 8 Truck - ISL G - CNG
z. Mack - Class 8 Truck - Pinnacle ISX12 G – CNG
aa. Mack - Class 8 Truck - Pinnacle ISX12 G – LNG
bb. Mack - Class 8 Truck - Pinnacle ISX12 G - RNG

CFSE-21 cont.

D. Near Zero Emission Class 8 Electric Tractors

There are currently eleven (11) Near Zero Emission Class 8 Electric Tractors available. See Public Comments Table of Contents and Attachments:

l. Kenworth - Class 8 Tractor - T680 ISL G
m. Kenworth - Class 8 Tractor - T880 ISL G NZ - Near Zero – CNG
n. Kalmar T 2 - 4x2 On Road Terminal Tractor ISL G - CNG
o. Kalmar T 2 - 4x2 On Road Terminal Tractor ISL G - LNG
p. Kalmar T 2 - 4x2 On Road Terminal Tractor ISL G - RNG
q. Kalmar T 2 - 4x2 Off Road Terminal Tractor ISL G - CNG
r. Kalmar T 2 - 4x2 Off Road Terminal Tractor ISL G - LNG
s. Kalmar T 2 - 4x2 Off Road Terminal Tractor ISL G - RNG
t. Autocar - ACTT - 4x2 DOT/EPA Terminal Tractor ISL G - CNG
u. Autocar - ACTT - 4x2 DOT/EPA Terminal Tractor ISL G - LNG
v. Capacity - Sabre 4x2 DOT Terminal Tractor ISL G - CNG

5. **Zero, Near Zero & Best Available Control Technologies For Construction & Dredging Equipment**

We request that the EIR include the identification and assessment of Zero, Near Zero & Best Available Control Technologies (BACT) for all categories of Construction & Dredging Equipment that can be included as Project Mitigation Measures. Such as what we researched for Zero and Near Zero Class 8 Trucks in these public comments but did not have sufficient time to do for all areas of project concern. CFSE-22

6. **Cumulative Impacts**

The Cumulative Impacts Assessments are significantly underestimated due to the underestimation of Air Emissions and Greenhouse Gas Emissions, Noise, Traffic Impacts as described in 2, 3 and 4. Any proposed Port Mitigation Measures are unacceptable. The identified Alternative Technologies in these public comments are currently feasible to reduce all Project Cumulative Impacts to less than significant. Increasing ship calls is also depriving residents and boat owners of the their boat recreational use as they have to limit their decreasing boating areas and time have to wait for ship passage. The CFASE Cumulative Impact Bibliography and other referenced CFSASE Bibliographies also provide detailed scientific and medical research studies that validate our public comments and need for mitigation. See Public Comments Table of Contents and Attachments: CFSE-23

7. **Project & Tenant Business Operations Noise**

The DEIR assessment of noise impacts is inadequate because it fails to acknowledge that pile driving noise can be heard for more than 1-mile away. The DEIR assessment fails to include noise from the 7,028 average daily truck trips (peak Month), 5.5 Average Daily Train Trips (peak Month) and non-peak months is significantly underestimated because they do not include all truck points of origin locations, port and tenant travel destinations in adjacent Port Environmental Justice Communities, transportation corridor and warehouse/distribution communities. The CFASE Public Health Bibliography, Port & Goods Movement, Railroad Industry Public Health Bibliography and others also provide detailed scientific and medical research studies that validate our public comments and need for mitigation. See Public Comments Table of Contents and Attachments: CFSE-24

The DEIR does not contain the noise information and noise data from the sources identified in these public comments in 2. Ground Traffic Transportation Unavoidable Significant Impacts Determination section.

The DEIR failed to consider information and Mitigation Measures contained in the Harbor Community Benefit Foundation Four Wilmington Noise Reports. See Public Comments Table of Contents and Attachments.

8. **Environmental Justice**

The Draft EIR failed to include a comprehensive identification and assessment of Environmental Justice Community Impacts and as a result fails to include appropriate Mitigation Measures. CFSE-25

We claim that the following as a minimum are not all identified, not all assessed and are underestimated:

a. Truck & Train Air Emissions
b. Truck & Train Greenhouse Gas Emissions
c. Truck & Train Noise & Vibration
d. Truck & Train Traffic Congestion
e. Socio-Economic Impacts
f. Ship, Truck, Train, Construction, Terminal Operations Public Health Impacts
g. Ship, Truck, Train, Construction, Terminal Operations Cumulative Impacts

CFSE-25 cont.

Public Comments #'s 2, 3, 4, 5, 6, 7 provide detail information on what was not identified, assessed and mitigated. The CFASE Environmental Justice Bibliography and other referenced CFSASE Bibliographies also provide detailed scientific and medical research studies that validate our public comments and need for mitigation. They additionally provide EJ Community identified feasible Alternative Technologies and Mitigation Measures. See Public Comments Table of Contents and Attachments.

9. Whale Strikes

The DEIR Biological Resources fails to identify, assess and mitigate potential ship Whale Strikes from the 208 Annual Ship Calls. Whale strikes have already occurred in the San Pedro Bay outer harbor as evidenced by a dead whale carcass photographed on the bow of a ship. The Port failed to research potential Whale Strike Prevention Mitigation Measures from marine biologist experts. Reference Whale Ship Strikes Bibliography. See Public Comments Table of Contents and Attachments:

CFSE-26

10. Container Tariff To Support Harbor Community Benefit Foundation Mitigate Off-Port Community Impacts

We request an annual $ 5.00 per Container Tariff or equivalent to support the Harbor Community Benefit Foundation to Mitigate Everport Project and Operations Off-Port Community Impacts until the end of the new lease in 2038.

CFSE-27

A USB Memory Drive which contains a Table of Contents and numerous documents referenced is submitted as part of the public comments. All documents contained in the USB Memory Drive in the Addendums are submitted as part of the public comments. All documents referenced as citations in documents are submitted as part of the public comments, the Port of Los Angeles and U.S. Army Corp Of Engineers are requested to read, review and consider all citations information as part of the public comments in their decision making process.

Respectfully Submitted,

Jesse N. Marquez

Jesse N. Marquez
Executive Director

Ricardo Pulido
Executive Director
Community Dreams
1601 N. Wilmington Blvd., Ste. B2
Wilmington, CA 90744
mr.rpulido@gmail.com
310-567-0748

Pastor Alfred Carrillo
Apostolic Faith Center
1510 E. Robidoux St.
Wilmington, CA 90744
alfredcarrillo@msn.com
310-940-6281

Magali Sanchez-Hall, MPH
Executive Director
EMERGE
913 East O Street
Wilmington, CA 90744
mssanchezhall7@gmail.com
646-436-0306

Chaplin Anthony Quezada
American Veterans (AMVETS)
1927 E. Plymouth St.
Long Beach, CA 90810
quezadaanthony85@yahoo.com
310-466-2724

Anabell Romero Chavez
Wilmington Improvement Network
Board Member
1239 Ronan Ave.
Wilmington, CA 90744
anab3ll310@yahoo.com
310-940-4515

Dr. John G. Miller, MD
San Pedro & Peninsula Homeowners Coalition
President
1479 Paseo Del Mar
San Pedro, CA 90731
igornla@cox.net
310-548-4420

Joe R. Gatlin
Vice President
NAACP
San Pedro-Wilmington Branch # 1069
225 S. Cabrillo Ave.
San Pedro, CA 90731
joergatlin45k@gmail.com
310-766-5399

Jane Williams
Executive Director
California Communities Against Toxics
P.O. Box 845
Rosamond, CA 93560
dcapjane@aol.com
661-256-2101

Robina Suwol
Executive Director
California Safe Schools
P.O. Box 2756
Toluca Lake, CA 91610
robinasuwol@earthlink.net
818-261-7965

Shabaka Heru
Executive Director
Society For Positive Action
P.O. Box 59541
Los Angeles, CA 90059
shabaka4ej@yahoo.com
310-462-6732

Cynthia Babich
Executive Director
Del Amo Action Committee
4542 Irone Ave.
Rosamond, CA 93560
delamoactioncommittee@gmail.com
310-769-4813

Mitzi Shpak
Executive Director
Action Now
2062 Lewis Ave.
Altadena, CA 91001
msmshpak@gmail.com
626-825-9795

Modesta Pulido
Chairperson
St. Philomena Social Justice Ministry
22106 Gulf Ave.
Carson, CA 90745
vdepulido@gmail.com
310-513-1178

Drew Wood
Executive Director
California Kids IAQ
1601 N. Wilmington Blvd., Ste. B4
Wilmington, CA 90744
californiakidsiaq@gmail.com
916-616-5913

Coalition For A Safe Environment

Port of Los Angeles
Berths 226-236 [Everport] Container Terminal Improvements Project
Draft Environmental Impact Report (DEIR)/Draft Environmental Impact Statement (DEIS)

6.5.2017

Public Comment Documents

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Note: 1. A USB Memory Drive which contains a Table of Contents and numerous documents is submitted as part of the public comments.
2. All documents contained in the USB Memory Drive in the Addendums are submitted as part of the public comments.
3. All documents referenced as citations in documents are submitted as part of the public comments, the Port of Los Angeles and U.S. Army Corp Of Engineers are requested to read, review and consider all citations information as part of the public comments in their decision making process.

2.3.5.3 Coalition for a Safe Environment (CFSE)

Response to Comment CFSE-1

The commenter's opinion that the Purpose, Need and Objectives contained within the Project Description of the EIS/EIR may not be entirely accurate or true is noted. The EIS/EIR, however, considers all of the reasonably foreseeable significant adverse impacts of the proposed project (or action) as required by NEPA/CEQA. The applicant/tenant serves numerous markets across the globe, and currently has 33 vessels to be used worldwide on order. Of these, 11 are for 18,000 TEU vessels. The largest vessels in Everport's fleet primarily serve the Asia/Europe market (Asia to/from Europe). Because the largest ships (i.e. 18,000 TEU) do not typically serve North America, it is speculative at this time to assume that one or more of the 11 future 18,000 TEU vessels would be incorporated into the vessel strings serving the Project site. The Draft EIS/EIR evaluates vessels up to 16,000 TEUs, which is believed to be the vessel size most likely used on the transpacific trade and what the terminal improvements have been designed for.

Regarding the request to prohibit 18,000 TEU vessels from berthing at the Everport Container Terminal, as stated above, it is unknown and speculative at this time if the facility will receive 18,000 TEU vessels. If such a scenario were to occur in the future, however, the Port would not prohibit 18,000 TEU vessels as requested by the commenter. This is because the use of such vessels is expected to improve overall impacts. Larger and newer vessels have cleaner engines compared to the older smaller vessels, and they can result in fewer ship calls due to their ability to accommodate higher capacities.

Regarding the commenter's request that a new (or revised) Draft EIS/EIR be prepared to address the speculative impacts of 18,000 TEU vessels which could, as assumed by the commenter, frequent the Project site at some point in the future, CEQA and NEPA do not require such an analysis. (See CEQA Guidelines, Sections 15144, 15145 [indicating that while drafting an EIR necessarily involves some degree of forecasting, EIRs should not rely on speculation in evaluating impacts].) The proposed Project has been designed to accommodate 16,000 TEU vessels and related reasonably foreseeable activities. The EIS/EIR considers the reasonably foreseeable significant impacts of the proposed Project.

Regarding the request that a new Draft EIS/EIR be prepared to include the contracting schedule for purchasing new trucks, chassis, truck staging areas, and container storage yards, the Port respectfully declines this request for the following reasons:

1. the Everport Container Terminal does not maintain its own truck fleet, rather, relies on independent owners and operators for container hauling;
2. the Everport Container Terminal does not own or control truck chassis;
3. the Draft EIS/EIR evaluation of the proposed Project includes the expansion of backlands for terminal operations such as container and container-related storage; and
4. the proposed Project and alternatives do not include off-site yards for storing containers other than peel-off yards, of which a portion of their capacity have been assigned to the Everport Container Terminal and included in the proposed Project's throughput capacity evaluated in the Draft EIS/EIR.

Regarding the request that a new Draft EIS/EIR be prepared that will include a schedule for the recruitment and training of drivers, the Port respectfully declines this request because the Everport Container Terminal does not maintain its own truck fleet, rather, the trucks that serve the terminal are controlled by independent owners and operators. Recruitment and training of truck drivers is the responsibility of the independent owner/operators and trucking companies and is therefore outside the scope of the Port's ability to require.

Response to Comment CFSE-2

The comment is noted. The comment does not identify any specific feasible alternatives or mitigation measures that would avoid or substantially lessen the significant adverse impacts of the Project and which are not included in the Draft EIR/EIS. The comment also does not specify which impacts the commenter believes are understated. Please see responses for CFSE-3 through CFSE-10 for specific responses to the suggested mitigation measures.

Response to Comment CFSE-3

The comment is noted. The term "peel-off yard" is consistent with the Port's press release from 2015 (https://www.portoflosangeles.org/newsroom/2015_releases/news_030915_peel_off_program.asp) regarding the topic, and there is no equivalent standard industry term identified. Therefore, the term "Peel-Off Yards" is appropriate to use in this EIS/EIR. The three peel-off yard locations that were included in the analysis are all on Terminal Island; one was assumed to be at Navy Way and Reeves Avenue, another was assumed to be at the LAXT Loop and adjacent Customs House building, and the third was assumed to be at Pier S in the Port of Long Beach. The traffic analysis considered all of the Project's transportation impacts, including trucks attributed to the Everport Container Terminal at the peel-off yards. The peel-off yards themselves are outside the scope of this EIS/EIR, and therefore, truck trips and containers utilizing each of the peel-off yards cannot be attributable to the proposed Project and alternatives are exclusively identified. They are, however, assumed to occur as part of the cumulative impact analysis.

Response to Comment CFSE-4

The comment is noted. The EIS/EIR assumes maximized use of Everport's on-dock railyard, and therefore maximizes the use of the Alameda Corridor. In addition, neither the Port nor the applicant/tenant has any jurisdiction over the use of the Alameda Corridor.

Response to Comment CFSE-5

The comment is noted. The implementation of large-scale alternative rail transportation systems at the ports, such as Maglev, is not feasible for consideration as mitigation for the impacts of the proposed Project. These systems generally require very large capital investments, have extensive geographical coverage, fall under the purview of the rail companies, and are disproportionate to the impacts of an individual project. In 2008, EMMI Logistics estimated the building cost for a complete MagLev system at 4.4 billion dollars (by 2013), which is likely underestimated at this point in time (American Maglev Inc., 2008). Although LAHD can authorize additional loading tracks at on-dock yards within the Port boundaries, the alternative rail transportation system would have to extend well beyond the on-dock yards to areas beyond the Port. Additionally, the project applicant/tenant has no means to implement such system-wide transportation improvements nor does the applicant/tenant or Port have any jurisdiction over rail transportation systems.

Although the commenter states that several firms have designed a goods movement system for containers, the Port issued a Request of Concepts and Solutions for a Zero Emission Container Movement System in 2010, and although numerous submittals were received, including one from one of the referenced firms, none of the submittals were found to be in full compliance with the request. In some instances, the costs were found to be underestimated, and in others, proof of concept was not demonstrated. [July, 2010 Zero Emission Container Movement System Evaluation results]. As a consequence, the use of an alternative rail technology as mitigation is not considered feasible at this time due to the prohibitive cost and because the Port and the applicant/tenant does not have jurisdiction over the rail transportation system to ensure implementation in a successful manner and within a reasonable period of time.

Response to Comment CFSE-6

The comment is noted. Please see Response to Comment CFSE-5 above.

Response to Comment CFSE-7

The comment is noted. The commenter states that the Draft EIS/EIR underestimated truck trips because it did not account for trips to the various facilities listed in bullet form in the comment and referenced attachment. The average daily truck trips under the proposed Project (7,028) represent the number of truck trips between the terminal and the first point of destination. The first point of destination is typically a near-dock rail yard, off-dock rail yard, or transloading facility. To the extent that the list of facilities in the comment is a transloading facility or a peel-off yard on Terminal Island, the number of daily truck trips listed in the Draft EIS/EIR include visits to those facilities. However, the other facilities in the list represent facilities that are owned and operated by non-affiliated third parties, that have been issued respective project approvals, and that have undergone respective environmental evaluations and documentation. Because those facilities are not a part of the proposed Project, and are owned and operated by third parties, the specific truck trips generated by those operations are not evaluated as part of the proposed project or Project Alternative in the Draft EIS/EIR.

Response to Comment CFSE-8

The recommendation that the Port provide dedicated freeway and highway truck lanes is acknowledged. The proposed Project would result in a significant impact at the freeway ramp intersection of Ferry Street and the SR47 intersection; however, the recommended mitigation would not address this impact. In addition, the Port does not have jurisdiction over the freeway or highway system.

Response to Comment CFSE-9

The comment is noted. A new underground truck tunnel from the Ports to various rail transportation yards would not be appropriate mitigation to include for a single terminal redevelopment project (such as Everport). In addition, this recommendation is not economically, logistically or technologically feasible to design and build (especially in an environment with very shallow groundwater, intervening Harbor channels, underground utilities, and right-of-way considerations). An underground truck tunnel would also likely result in numerous significant adverse environmental impacts, including groundwater impacts and air quality impacts, associated with constructing and operating the tunnel, and would require a separate environmental document, which would be, at a minimum, an EIR.

Response to Comment CFSE-10

LAHD is unclear what the correlation is between a multi-story parking lot and the Everport Container Terminal. The proposed Project seeks to provide facility improvements to allow for larger and cleaner vessels to visit the site. The associated trucks to accommodate the increased throughput do not park long-term at the site; but rather, pick up containers for transport. It is unclear how this parking structure would serve as mitigation at the site or mitigate this project in any way. It's further unclear how a parking structure would assist Environmental Justice Communities. Construction and operation of any such structure would also pose potentially significant adverse environmental impacts that would need to be addressed in a separate environmental assessment, such as an EIR.

Response to Comment CFSE-11

The comment is noted. As stated in lease measure LM AQ-1, the best feasible emission reducing equipment shall be implemented as it is determined to be feasible for work at the port. Feasibility for equipment is based on the ability for the equipment to perform consistently in the port environment, and takes into account technical feasibility; infrastructure availability for electric grid connections, fuel cell and/or natural gas equipment; operational feasibility for marine port conditions; and economic feasibility. LAHD disagrees with the claim that the commenter's suggested equipment and systems are commercially available today. For more information, see Master Response 2: Zero-Emission Technologies. Please also see Response to Comment CARB-8 with regards to increased compliance with Alternative Maritime Power (AMP) in 2020.

Response to Comment CFSE-12

The comment is noted. The Draft EIS/EIR assessed greenhouse gas emissions and identified those impacts that are significant in Section 3.5 – Greenhouse Gas Emissions. The Draft EIS/EIR also evaluated cancer and non-cancer risk in Section 3.2 – Air Quality and Appendix B3, and determined that individual cancer and non-cancer risks would be less than significant under CEQA without mitigation. Note that CEQA does not require all impacts from a project be fully mitigated in order to be approved, only that feasible mitigation measures be applied (CEQA Statute Section 21002).

Response to Comment CFSE-13

The comment is noted. LM AQ-1 and LM AQ-2 provide mechanisms for incorporating into terminal operations those technologies that become feasible in the future. No credit is taken for these lease measures in the mitigated scenarios. In addition, these measures are acceptable as commitments by LAHD. LAHD disagrees with the assertion that the commenter's suggested equipment and systems are commercially available today. For details on the feasibility assessment process for the Port of Los Angeles, see Master Response 1: Feasible Mitigation – Guidance and Applicability, Master Response 2: Zero-Emission Technologies, and Master Response 3: Port-wide Emission Reduction Programs. Please also see Response to Comment CFSE-11, above. In addition, the status in the development phase of Zero Emission technologies is provided in Master Response 2.

Response to Comment CFSE-14

The comment is noted. Please see Response to Comment CFSE-7, above.

Response to Comment CFSE-15

The comment is noted. Long term feasibility assessments are underway at both Everport Container Terminal and other terminals located at the port and across the state of California. For more details, please see Master Response 2: Zero-Emission Technologies. The Evergreen vessels calling at the Everport Container Terminal are designed to use AMP, thus can achieve virtually 100 percent AMP usage. Alternative ship capture technologies, in the form of the Marine Exhaust Treatment System (METS-1) are currently being evaluated for feasibility at the Pasha Stevedoring terminal through the Green Omni Terminal Demonstration Project. For more information regarding the project, see the port's announcement of the project at https://www.portoflosangeles.org/environment/progress/news/pasha-port-los-angeles-california-air-resources-board-partner-green-omni-terminal-demonstration-project/. When these technologies become feasible and commercially available, LAHD will incorporate them into the lease agreements per LM AQ-1. Therefore, no emission reductions as a result of these technologies were included in the air quality impact analysis in the Draft EIS/EIR, Section 3.2.

Response to Comment CFSE-16

The comment is noted. Please see Responses to Comments CFSE-11 and CFSE-15, above. In addition, the commenter is referencing zero-emission technologies, near-zero- emission technologies and BACT, etc., but not providing specific examples of what should have been incorporated at the Project site.

Response to Comment CFSE-17

The comment is noted. Please see Response to Comment CFSE-19, below.

Response to Comment CFSE-18

The comment is noted. Please see Responses to Comments CFSE-13, above.

Response to Comment CFSE-19

The comment is noted. LAHD has identified and analyzed GHG emissions from project-related sources including container ships, tug boats, cargo handling equipment, trucks and automobiles, and rail locomotives, as well as construction equipment. The GHG impact analysis is presented in the Draft EIS/EIR, Section 3.5. Also, please see Response to Comment CFSE-7 regarding the extent of project-related truck activity. Regarding the comment that the Port "arbitrarily" set the cap for the Carbon Offset Fund to $250,000, the amount of financial contribution is not arbitrary. The figure will equate to one percent (1 percent) of the MAG (Minimum Annual Guarantee) in the lease based on the calendar year prior to the commencement of construction, which the Harbor Department has determined would not threaten the economic viability of the project. This figure should equate to slightly over $300,000 based on current estimates. This is an increase in the originally projected amount of $250,000 even though a refined analysis indicates that GHG emissions from the proposed Project will be significantly lower than previously assessed.

Response to Comment CFSE-20

The comment is noted. Please see Response to Comment CFSE-7, above.

Response to Comment CFSE-21

The comment is noted. Please see Response to Comment CFSE-15, above.

Response to Comment CFSE-22

The comment is noted. Note that Best Available Control Technology (BACT) is a term reserved for air quality permitting of stationary sources, such a power plants, petroleum refineries, and chemical manufacturing facilities to name a few. The SCAQMD defines BACT under Regulation XIII – New Source Review in Rule 1302(h). Since the sources associated with the Everport Container Terminal are mobile (ships and boats, trucks, trains, and cargo handling equipment), BACT does not apply to the project. The project now includes, subject to availability, electric equipment for dredging activities, please see Response to Comment CARB-14 regarding the addition of electric dredge equipment into MM AQ-5, as well as the type of dredging equipment assumed for calculating construction emissions in the Draft EIS/EIR, and Response to Comment MCC-1 regarding the incorporation of electric equipment requirements for dredging specifications. Please also see Master Response 1: Feasible Mitigation – Guidance and Applicability, Master Response 2: Zero-Emission Technologies, and Master Response 3: Port-wide Emission Reduction Programs.

Response to Comment CFSE-23

The comment is noted. Please refer to Responses to Comments CFSE-3, CFSE-7, CFSE-12, CFSE-14, CFSE-17, CFSE-19 and CFSE-20. The commenter asserts that cumulative impacts are underestimated; however, no specific deficiencies or examples were provided. Therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)). Regarding air quality and greenhouse gas mitigation measures, please see Master Response 1: Feasible Mitigation – Guidance and Applicability, Master Response 2: Zero-Emission Technologies, and Master Response 3: Port-wide Emission Reduction Measures. In addition, the commenter has provided no evidence that increasing ship call would deprive residents and boat owners of their boat recreational use due to decreased boating areas and increased time to wait for ship passage. The potential 42 additional vessel call *a year* (emphasis added) would not increase the number of vessels that could use the terminal at any one time; therefore, on any given day, it is not anticipated that boating would not be affected by the proposed Project.

Response to Comment CFSE-24

The comment is noted. The Draft EIS/EIR evaluates construction noise impacts in Section 3.10, Noise. Table 3.10-9, Summary of Daytime Construction Noise Impact identifies the noise level from pile driving activities assuming that an impact pile driver is used and includes a decibel rating of 107 to be conservative. The analysis then evaluated various receptor locations in the vicinity, including the Cerritos Channel Marina where liveaboards are present. This receptor is located approximately 10,000 feet from the pile driving activities, and this distance is greater than one-mile from the project site. It should be noted that although pile driving noise may be discernible at a distance of one-mile, the noise level increase at this distance would not exceed the significance threshold level due to attenuation with distance. The Draft EIS/EIR also evaluated the effects of construction noise on closer receptors and identified potentially significant noise impacts at two locations, liveaboards in Fish Harbor, and the San Pedro Tourism Area. Two mitigation measures (MM NOI-1 and MM NOI-2) have been included to reduce potential noise impacts from pile-driving. With mitigation, construction-related noise impacts were found to be less than significant.

Contrary to the comment, the noise evaluation in the Draft EIS/EIR includes an evaluation of the terminal operations for the proposed Project on page 3.10-31, which includes truck trips and rail trips associated with full build out of the terminal. The evaluation determined that project operations would not result in an increase in ambient noise levels of 3 dBA or greater, and thus found operational impacts related to noise increases to be less than significant.

The evaluation of operational noise from rail and truck trips includes an analysis of the truck routes and the first point of destination. This means that the majority of trips are assumed to travel along major thoroughfares and represent the most concentrated travel activities that could occur. Thus, they reflect the maximum operational noise levels that could occur. Although there may be non-affiliated third-party operations such as warehouses throughout Southern California that ultimately accept goods that were delivered to the Port, these facilities are dispersed and located in areas and on land zoned for such activities. These associated trips would be much less than would occur along the major thoroughfares. Thus, the incremental increase in noise associated with third party activities would be less than the noise associated with trips between the Everport Container Terminal and the first point of destination. The Draft EIS/EIR thus represents a worst-case analysis.

Regarding the comment that the Draft EIS/EIR does not include noise information from the sources identified in the Commenter's second point above, those sources represent facilities owned and operated by non-affiliated third parties that have been issued respective project approvals and have undergone respective environmental evaluations and documentation in order to allow them to operate separate from this project.

They are not part of this project and are not being constructed as a result of this project. No further evaluation is necessary.

Regarding the comment that the Draft EIS/EIR failed to consider information and mitigation in the Harbor Community Benefit Foundation four Wilmington Noise Reports, the construction of the proposed Project would not result in significant noise impacts in Wilmington (which is north of the Cerritos Channel marina with Liveaboards (see Table 3.10-9 of the Draft EIS/EIR), and would not result in significant noise impacts from operations. As a consequence, noise mitigation in Wilmington was not required.

Response to Comment CFSE-25

The comment is noted. Please refer to Responses to Comments CFSE-2 through CFSE-24 regarding mitigation measures and/or emission sources. Project-related air quality and health risk impacts were presented in the Draft EIS/EIR, Section 3.2 and Appendix B; and greenhouse gas emissions were presented in Section 3.5 and Appendix B1. Project-related noise impacts were presented in Section 3.10. Project-related traffic impacts were presented in Section 3.6 and Appendix E. Cumulative impacts were presented in Chapter 4, and Socioeconomic impacts were presented in Chapter 7. As with the comments above where the commenter has pointed to, and provided, bibliographies, the documents provided do not reference specific proposed Project components, but other projects and areas outside of the Project site. In addition, the commenter does not specifically call out an issue or deficiency; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

Response to Comment CFSE-26

The comment is noted. The commenter incorrectly states that the Draft EIS/EIR Biological Resources fails to identify, assess and mitigate the potential for whale strikes from the 208 annual ship calls. Section 3.3, Biological Resources, of the Draft EIS/EIR, beginning on page 3.3-18, identifies the issue of potential vessel collisions with sea turtles and marine mammals (which includes whales) and includes a separate section about whale strikes. Under the Impact Determination section (Section 3.3.4.3), the potential for the proposed Project and each of the alternatives to impact sea turtles and marine mammals and increase whale strikes, is described under Impact BIO-1. Any increase in vessel traffic caused by the proposed Project may incrementally increase the potential for vessel strikes. However, this impact is considered less than significant under CEQA and NEPA because of the low probability of vessel strikes. Even though impacts due to vessel strikes are considered less than significant, with no mitigation required, implementation of mitigation measure MM AQ-6, Vessel Speed Reduction Program (see Section 3.2, Air Quality and Meteorology), would further reduce the potential for vessel collision with marine mammals and sea turtles.

Response to Comment CFSE-27

The comment is noted. Please see Response to Comment USEPA-9.

The supplemental documents and information provided, and referenced, by the commenter throughout the comment letter do not constitute a comment under CEQA. In addition, the supplemental documents/information do not identify specific proposed Project components, but other projects and areas outside of the Project site; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)). Due to the large file sizes and voluminous nature of the documented provided, copies of the documents attached to the June 5, 2017 comment letter on the Draft EIS/EIR from CFSE can be viewed at the LAHD Environmental Management Division, 222 West 6th Street, Suite 900, San Pedro, CA 90731, or on the Port's website at http://www.portoflosangeles.org under the Environmental tab, as part of the Final EIS/EIR, so that members of the public wishing to view this information may do so.

From: Adrian Martinez [mailto:amartinez@earthjustice.org]
Sent: Monday, June 5, 2017 11:48 PM
To: Ceqacomments; 'Theresa.stevens@usace.army.mil'
Subject: Berths 226-236 [Everport] Container Terminal Improvements Project

Berths 226-236 [Everport] Container Terminal Improvements Project

On behalf of Earthjustice, I submit these comments on the Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) for the Everport Container Terminal project. At the outset, I concur generally with the comment letter submitted by the Natural Resources Defense Council and other groups. I simply write this letter to add two additional points. First, the energy analysis in the Draft EIR fails to comply with CEQA. Second, that the Draft EIR fails to comply with CEQA's energy consumption mitigation requirements articulated in Appendix F, CEQA, and the CEQA Guidelines. **EJ-1**

Energy Impact Analysis

CEQA creates an independent obligation to analyze the energy impacts from a proposed project. Here, the Draft EIR fails to provide sufficient information regarding the project's energy use. Recent court decisions have made clear that CEQA's obligation to do an energy analysis (see Cal. Pub. Res. Code § 21100, subd. (b)(3).) extends beyond the tangential discussion of energy in sections like the greenhouse gas analysis or air quality analysis. (See *Ukiah Citizens for Safety First v. City of Ukiah*, 248 Cal. App. 4th 256 (2016).) Thus, recent decisions have affirmed that agencies must take their obligations under CEQA's energy provisions seriously. To comply with this section of CEQA, the EIR must disclose energy impacts from transportation and other sources during the construction and operation of the project. This analysis is particularly important for this project because of the immense potential energy consumption related to the vehicles and other equipment operating at this site. Only a full disclosure of the energy landscape of this project will provide the necessary information for the public and decision makers to understand the scope of energy impacts. **EJ-2**

The EIR Must Include Energy Mitigation

Once the Draft EIR cures the problems with the energy analysis, it must examine feasible mitigation. Mitigation is the core of the energy impacts analysis. In fact, the CEQA section that creates the obligation for an energy analysis refers to it in terms of "[m]itigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy." (See Cal. Pub. Res. Code § 21100, subd. (b)(3).) Importantly Appendix F of CEQA suggest the following parameters to mitigate energy use: **EJ-3**

> The means of achieving this goal include:
> (1) decreasing overall per capita energy consumption,
> (2) decreasing reliance on fossil fuels such as coal, natural gas and oil, and
> (3) increasing reliance on renewable energy sources.

(Appendix F, CEQA.) Several mitigation options could present themselves to achieve all three goals. Increasing use of zero emission vehicles would help with decreasing reliance on fossil fuels. Moreover, integrating renewable energy into this project will also achieve the third part of achieving this goal. However, before identifying the specific mitigation, the Draft EIR must include a full assessment of energy impacts to understand what mitigation obligations exist.

EJ-4

Please do not hesitate to contact me if you have questions about these comments.

Sincerely,

Adrian Martinez

Adrian Martinez
Staff Attorney
Earthjustice California Office
800 Wilshire Blvd, Suite 1000
Los Angeles, California 90017
T: 415.217.2000
F: 415.217.2040
earthjustice.org

2.3.5.4 Earthjustice (EJ)

Response to Comment EJ-1

Please see Master Response 4: Energy Usage and Appendix F

Response to Comment EJ-2

Please see Master Response 4: Energy Usage and Appendix F

Response to Comment EJ-3

Please see Master Response 4: Energy Usage and Appendix F

Response to Comment EJ-3

Please see Master Response 2: Zero- Emission Technologies

LOS ANGELES AREA
CHAMBER OF COMMERCE

June 5, 2016

Chris Cannon
Director, Environmental Management
Port of Los Angeles
P.O. Box 151
San Pedro, CA 90733

Theresa Stevens, Ph.D.
Los Angeles District, Regulatory Division
U.S. Army Corps of Engineers
2151 Alessandro Dr., Ste. 110
Ventura, CA 93001

RE: Draft EIS/EIR - Berths 226-236 [Everport] Container Terminal Improvements Project

Dear Mr. Cannon and Dr. Stevens:

On behalf of the Los Angeles Area Chamber of Commerce, I am writing to support the Everport Container Terminal Improvements Project at the Port of Los Angeles (POLA).

This project will serve to optimize the container-handling efficiency and capacity of POLA to accommodate the projected fleet mix of larger container vessels that are anticipated to call at the Everport Container Terminal through the next two decades. Due to increased demands for goods, larger vessels are being deployed to reduce container shipping costs. As industry trends shift, continual modernization of our port infrastructure is essential.

LAC-1

By optimizing the use of existing land, dredging for sufficient depth, adding new cranes and raising existing ones, and increasing efficiency for container handling, the Everport Terminal improvements will ensure we are poised to compete for the benefit of our regional economy. The project will also create good jobs- both during the project and in the staffing of the modernized terminal.

With the goods movement sector contributing to nearly one-third of the regional economy, efficient transportation of cargo through our ports is vital to maintaining a thriving economy. For these reasons, the LA Chamber supports the Everport Container Terminal Improvements Project.

Sincerely,

Gary Toebben

Gary Toebben
President & CEO

350 S. Bixel St. | Los Angeles, CA 90017 | P: 213.580.7500 | F: 213.580.7511 | lachamber.com

2.3.5.5 Los Angeles Area Chamber of Commerce (LAC)

Response to Comment LAC-1

Thank you for your comment on the Draft EIS/EIR. LAHD and USACE acknowledge LAC's review and that no comments are provided; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

&

West Long Beach Association
California Kids IAQ
Community Dreams
Apostolic Faith Center
EMERGE
Wilmington Improvement Network
American Veterans (AMVETS)
NAACP - San Pedro-Wilmington Branch # 1069
St. Philomena Social Justice Ministry
San Pedro and Peninsula Homeowners Coalition

June 5, 2017

Via USPS and Email

U.S. Army Corps of Engineers
Los Angeles District, Regulatory Division
Ventura Field Office
ATTN: Theresa Stevens, Ph.D.
2151 Alessandro Drive, Suite 110
Ventura CA 93001
Theresa.stevens@usace.army.mil

Port of Los Angeles
Christopher Cannon
Director of Environmental Management
P.O. Box 151
San Pedro, CA 90733-0151
ceqacomments@portla.org

Dear Dr. Stevens and Mr. Cannon:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement/Environmental Impact Report ("DEIS/DEIR) for the Everport Container Terminal Project (hereinafter the "Project"). The signatories to this letter are dedicated to reducing the Port's impacts on local communities, and have engaged in the environmental review process for numerous Port-related projects over the years.

While we appreciate the mitigation measures incorporated into the Project to date, we believe there is much more the Army Corps and Port can do to reduce the Project's impacts. Notably, the DEIS/DEIR concludes that the Project will yield "significant and unavoidable" environmental impacts, including impacts to air quality, greenhouse gas emissions, and

NRDC-1

environmental justice, as well as cumulative impacts. These impacts will occur in a region that continually violates federal clean air standards for ozone and particulate matter, and in a State that has ambitious climate policies that need the Port's cooperation. Further, the Project's impacts will disproportionately affect environmental justice communities near the Port. It is this context in which the DEIS/DEIR must be considered. It is also within this context that we recommend that additional mitigation be adopted for the Project.

NRDC-1 cont.

I. The Project Should Adopt More Mitigation to Reduce Operational Ship Emissions

The DEIS/DEIR reports the following "significant and unavoidable" air quality impacts from Project operations under the California Environmental Quality Act ("CEQA") and the National Environmental Policy Act ("NEPA"):

- CEQA: Operations would be significant and unavoidable for CO and VOC in 2033 and 2038.
- NEPA: Operations would be significant and unavoidable for NOX in 2026, 2033, 2038 and CO and VOC in 2033 and 2038.
- CEQA: Operations would be significant and unavoidable for NO2 (federal 1-hour average), PM10 (24-hour and annual averages), and PM2.5 (24-hour average).
- NEPA: Operations would be significant and unavoidable for PM10 (24-hour and annual averages).

NRDC-2

See DEIS/DEIR at ES-28 (Table ES-3). Emissions from ships (main propulsion engines, and auxiliary engines and boilers) at the largest contributor to these "significant and unavoidable" air quality impacts. Accordingly, we strongly urge the DEIS/DEIR to include more mitigation for ship emissions. Specifically, while we acknowledge that the percentage compliance rates discussed in the DEIS/DEIR for vessel speed reduction and alternative maritime power are already relatively high, the environmental study should consider the feasibility of adopting even higher rates.

For instance, the DEIS/DEIR states that:

> By 2020 or upon substantial completion of construction, 85 percent of Evergreen ships calling at the Everport Terminal must use AMP. By 2026, 95 percent of all ship calls at the Everport Container terminal must be AMP or approved equivalent under the CARB Shore-Power Regulation. The equivalent alternative technology must, at a minimum, meet the emission reductions that could be achieved from AMP.

Id. at 3.2-51. The DEIS/DEIR should assess the feasibility of an above 85% compliance rate in 2020 (or upon completion of construction) including through the use of an equivalent alternative technology. Similarly, the DEIS/DEIR should assess the feasibility of requiring a 95% compliance rate before 2026, and a higher compliance rate at and after 2026.

Given the amount of ships emissions from the Project, and CEQA's mandate that the DEIR include all feasible mitigation, the Port should include this additional mitigation.

II. The Project Should Adopt Mitigation for Trucks Used During Project Operations

Under the CEQA baseline (2013), annual throughput at the terminal was 1,240,773. During the operational phases of the Project, TEUs will increase as follows:

YEAR	ANNUAL TEU THROUGHPUT	% INCREASE FROM CEQA BASELINE
2026	1,843,297	49%
2033	2,379,525	92%
2038	2,379,525	92%

Id. at App. B1 (Table 3.2-2). These additional TEUs will be moved by equipment and vehicles, including drayage trucks. Appendix B1 Table 3.2-4 depicts annual operational phase truck trips increasing from 1,112,551 in 2013 to 1,735,493 in 2033 (and holding at these rates in 2038), an increase of 622,942 truck trips annually. **NRDC-3**

Despite this increase, there is no mitigation for trucks within the DEIS/DEIR (aside from the development of a priority access program, which the DEIS/DEIR does not take credit for as mitigation). There are, however, meaningful opportunities to mitigate truck emissions. Indeed, the DEIS/DEIR indicates that in 2038, nearly 130,000 TEUs will be moved to peel-off yard(s) annually. *Id*. at ES-17 (Table ES-2). The DEIS/DEIR should consider requiring truck trips to/from peel-off yards to the Project site to be moved by zero emissions miles. Technologies such as battery electric trucks can accomplish these moves and are feasible today. Depending on the location of the peel-off yard, it is conceivable that some of these moves could even be performed by zero-emissions yard hostlers. In addition to reducing criteria pollutants, such mitigation would reduce the Project's significant greenhouse gas emissions.

Additionally, the Port has articulated in its Clean Air Action Plan discussion draft that it is targeting an all zero-emissions truck fleet by 2035. The DEIS/DEIR should include this CAAP goal as a requirement in the terminal lease, as well as interim deadlines to ensure ultimate compliance.

III. The Project Should Adopt Mitigation for Rail Operations

While ship emissions are the largest contributor to the Project's operational air quality impacts, over the life of the Project, line haul rail's contribution to, e.g., total NOx emissions, increases. For example, in 2019, line haul locomotives represent 9% of total NOx emissions, but by 2038, they represent 69%--resulting in a 123% overall increase. DEIR/DEIS at 3.2-46–48 (Table 3.2-20). The DEIS/DEIR should consider additional mitigation for this emissions source. **NRDC-4**

In the 2010 CAAP, the Port articulated that:

> By 2020, goal for 95% of Class 1 line-haul locomotives entering the ports to meet Tier 4 standards. For a minimum performance requirement, by 2023, Class 1 line-haul locomotives entering the ports will meet an emissions equivalent of 40% USEPA Tier 3 line haul locomotive standards and 50% Tier 4 line haul locomotive standards,

which may be implemented as mitigation for an identified impact through the CEQA environmental process or as a contractual lease requirement above what would be required strictly based upon identified impacts in the environmental analysis.[1]

NRDC-4 cont.

Emissions from Tier 4 line haul locomotives are over 70 percent lower than Tier 2 line-haul locomotives. Therefore, a transition to a Tier 4 fleet will provide significant emission reduction benefits. The Port must continue to pursue its 2010 CAAP commitment to work with agency partners to accelerate the turnover of the line-haul locomotive fleet so that by 2020, the state-wide fleet is comprised of at least 95 percent Tier 4 line-haul locomotive engines. If the Port is committed to the goals articulated in its various Clean Air Action Plans, it should likewise make those commitments in its project documents.

IV. The Project Should Explore Any and Every Opportunity to Advance Zero-Emissions Technologies

Governor Brown and air quality regulators have made clear that California will not meet national health-based air quality standards and state greenhouse gas reduction goals if the Ports proceed with a "business as usual" approach for moving freight. The California Air Resources Board has explained that "California must take effective, well-coordinated actions to transition to a zero-emission transportation system for both passengers and freight."[2] Given the Project's "significant and unavoidable" air quality and greenhouse gas impacts, and the State's directives, the Port should explore every opportunity to advance zero emissions technologies.

Preliminarily, we acknowledge and appreciate the information shared at the May 10, 2017 public meeting, which indicates that the Project will use approximately 30 pieces of zero emissions or ultra-low NOx cargo handling equipment. However, the Port can and should be doing more. As discussed above, the Port should adopt a zero-emission truck requirement for trips to nearby peel-off yards. The DEIS/DEIR should also embody (as lease requirements) the CAAP's 2030 zero-emissions goal for all cargo handling equipment and the complimentary 2035 all zero-emissions truck goal. The DEIS/DEIR should also analyze what infrastructure is needed at the terminal to support the terminal's current and projected electricity needs given the Port and State's larger zero emissions goals.

NRDC-5

A sustainable freight system requires a long-term wholesale transformation away from fossil-fueled technologies. Such transformation starts with widespread implementation of zero-emission technologies that are already viable in applications with the potential for significant expansion. Zero-emission technology, such as drivetrains powered by batteries or hydrogen fuel cells, are available for some truck types, as well as forklifts, gantry cranes, and other types of goods movement equipment. As with the early light duty vehicle electrification market, the market faces higher per vehicle costs, vehicle availability, limited manufacturers, and other early market entry barriers including limited fleet experience with the vehicles. These, however, are barriers that can be overcome with the right policies and investments to successfully move the freight system toward zero-emission technologies. Increased deployment of these technologies

[1] SAN PEDRO BAY PORTS, FINAL CLEAN AIR ACTION PLAN 2010 UPDATE 153 (Oct. 2010), *available at* http://www.cleanairactionplan.org/documents/2010-final-clean-air-action-plan-update.pdf at 156.

[2] AIR RES. BD., SUSTAINABLE FREIGHT: PATHWAY TO ZERO AND NEAR-ZERO EMISSIONS at 1 (April 2015), *available at* http://www.arb.ca.gov/gmp/sfti/sustainable-freight-pathways-to-zero-and-near-zero-emissions-discussion-document.pdf.

will help create economies of scale. As use of zero-emission technologies grows, prices will fall and the efficiency of those technologies will improve.[3] Growing use of zero-emission technologies will also require greater investment in infrastructure that supports these technologies.

Where short-term adoption of zero-emission technologies is not yet possible, other interim strategies must be pursued to lower emissions from conventional technologies such as through programs mandating cleaner fossil fuels. But these must be viewed as short-term, interim strategies that should be designed to support the longer-term transformation away from fossil fuels altogether.

NRDC-5 cont.

V. The Project Should Set Aside Mitigation Funds to Offset the Project's "Significant and Unavoidable" Impacts

Residential areas closest to the Project site are predominantly communities of color and have a higher concentration of low-income residents relative to Los Angeles County. DEIS/DEIR, at 5-17–20. Further, Project operations will take place at the same time as other current and future projects at the Port and surrounding areas, which also produce air pollution. *See* DEIS/DEIR at 4-38–43. For these and other reasons, the DEIS/DEIR concludes that Project generated emissions will contribute to "significant and unavoidable" environmental justice and cumulative impacts.

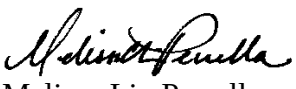
The continual onslaught of expansion projects at the Port of Los Angeles and nearby Port of Long Beach, as well as other industrial operations in the area have—for years—contributed to a cumulative environmental health burden shouldered by environmental justice communities near the Port. To mitigate these impacts, Port and Army Corps should consider providing mitigation funds to the Harbor Community Benefit Foundation ("HCBF").

NRDC-6

HCBF seeks to ensure that the harbor communities of San Pedro and Wilmington are safe, healthy, and beautiful places in which to live, learn, work, play. *See* www.hcbf.org. HCBF funds programs that address Port impacts, and has a long history of collaborating with the Port. Providing funding to HCBF should be explored as a feasible mechanism for mitigating the Project's environmental justice and cumulative impacts.

Thank you for considering our comments. If you have any questions, please contact Melissa Lin Perrella, at the Natural Resources Defense Council (NRDC), mlinperrella@nrdc.org; (310) 434-2300.

Sincerely,



Melissa Lin Perrella,
Natural Resources Defense Council

[3] EELCO DEN BOER ET AL., ZERO EMISSIONS TRUCKS: AN OVERVIEW OF STATE-OF-THE-ART TECHNOLOGIES AND THEIR POTENTIAL 16-17 (July 2013) [hereinafter "CE Delft Report"], *available at* http://www.theicct.org/sites/default/files/publications/CE_Delft_4841_Zero_emissions_trucks_Def.pdf.

Taylor Thomas,
East Yard Communities for environmental Justice

Kathleen Woodfield
Dr. John G. Miller, MD,
San Pedro and Peninsula Homeowners Coalition

Nidia Erceg
Joe Lyou,
Coalition for Clean Air

Jesse Marquez,
Coalition for a Safe Environment

Drew Wood,
California Kids IAQ

Ricardo Pulido,
Community Dreams

Pastor Alfred Carrillo,
Apostolic Faith Center

Chaplin Anthony Quezeda,
American Veterans (AMVETS)

Magali Sanchez-Hall, MPH,
EMERGE

Anabell Romero Chavez,
Wilmington Improvement Network

Joe R. Gatlin,
NAACP

Modesta Pulido,
St. Philomena Social Justice Ministry

Laura Cortez,
Long Beach Alliance for Children with Asthma

Theral Golden,
West Long Beach Association

2.3.5.6 Natural Resources Defense Council (NRDC)

Response to Comment NRDC-1

The comment is noted. Please see Responses to Comments NRDC-2 through NRDC-6 below. Also, please see Master Response 1: Feasible Mitigation: Guidance and Applicability, Master Response 2: Zero-Emission Technologies, and Master Response 3: Port-wide Emission Reduction Programs.

Response to Comment NRDC-2

The comment is noted. The commenter notes the significant impact findings in the Draft EIS/EIR and requests that additional mitigation be applied to ship emissions. Please see Master Response 1: Feasible Mitigation: Guidance and Applicability, and Master Response 3: Port-wide Emission Reduction Programs. Also, please see Response to Comment CARB-8, which notes that LAHD will require at least 90 percent utilization of shore-based power by 2020 for vessels equipped with shore power capabilities as mandated in Proposition 1B. As also explained in Response to Comment CARB-8, LAHD encourages all tenants to strive for 100 percent utilization of shore power. However, the Everport Container Terminal does occasionally service non-Evergreen ships. These other vessels may or may not be able to utilize shore power; therefore, the air quality impact analysis reasonably assumes 90 percent utilization by 2020 and 95 percent utilization with mitigation measure MM AQ-7 by 2026 (see Chapter 3 of this Final EIS/EIR for the revised mitigation measure).

Response to Comment NRDC-3

The comment is noted. The commenter suggests additional mitigation for trucks, including the use of zero-emission drayage trucks. Please see Master Response 1: Feasible Mitigation – Guidance and Applicability, Master Response 2: Zero-Emission Technology, and Master Response 3: Port-wide Emission Reduction Programs. Note that the Draft EIS/EIR did incorporate the effects of the port-wide Clean Truck Program into the truck emission factors under both unmitigated and mitigated scenarios, as noted in Appendix B1, Section 3.2, page B1-32. The Draft 2017 Clean Air Action Plan (CAAP) update has been released but has not yet been adopted, therefore, no emission reduction credit has been taken for any targets identified in the document. A hearing on the 2017 CAAP is anticipated to occur late 2017 and all commitments in the CAAP will be implemented regardless of the proposed Project.

Response to Comment NRDC-4

The comment is noted. The commenter suggests that additional rail mitigation be included in the project mitigation measures, per the 2010 CAAP Update. Note that the 2010 CAAP Update relies on efforts by USEPA and CARB to reduce rail line haul locomotive emissions. LAHD is pre-empted by the federal Surface Transportation Board from requiring/mandating certain types of locomotives be operated at the Port. Please see Response to Comment CARB-7, as well as Master Response 1: Feasible Mitigation: Guidance and Applicability, and Master Response 3: Port-wide Emission Reduction Programs.

Response to Comment NRDC-5

The comment is noted. The commenter suggests that zero-emission technologies be incorporated into project mitigation. Please see Master Response 2: Zero-Emission Technologies, as well as Master Response 1: Feasible Mitigation: Guidance and Applicability.

Response to Comment NRDC-6

The comment is noted. Section 7.2.2.2, Port Community Programs and Redevelopment, in the Draft EIS/EIR discusses the HCBF. Note that the PCMTF which the HCBF administers ended in May 2016, and currently no mechanism exists for LAHD to contribute to the PCMTF. Refer also to Response to Comment USEPA-10 for a discussion on the mitigation trust fund.

PMSA
PACIFIC MERCHANT SHIPPING ASSOCIATION

June 5, 2017

Chris Cannon
Director of Environmental Planning
Environmental Management Division
Port of Los Angeles
P.O. Box 151
San Pedro, California 90731

U.S. Army Corps of Engineers,
Los Angeles District
Regulatory Division
ATTN: Theresa Stevens, Ph.D.
2151 Alessandro Drive, Suite 110
Ventura, California 93001

Submitted Electronically to cegacomments@portla.org and theresa.stevens@usace.army.mil

Subject: Draft EIS/EIR for the Berths 226-236 [Everport] Container Terminal Improvements Project

Dear Mr. Cannon and Ms. Stevens:

The Pacific Merchant Shipping Association (PMSA) would like to express its support for the Berths 226-236 [Everport] Container Terminal Improvements Project. The project will make significant improvements to the facility that will allow Everport to effectively compete with other North American gateways. Through the proposed berth improvements larger vessels will be able to call. The ability to handle larger vessels allows both greater efficiency and reduced emissions per container handled – a needed feature to handle the Port of Los Angeles's (Port) forecast growth.

Both the Proposed Project and Alternative 5 make needed improvements to the facility. However, Alternative 5 includes important and vital improvements to the Terminal Island Container Transfer Facility (TICTF). An expanded TICTF will allow Everport to continue to grow its use of on-dock rail. This is consistent with Port proposed aspirational goal of increasing on-dock rail use to 50% of all container throughput, as discussed in the Draft Discussion Document for the Clean Air Action Plan. Expanding on-dock rail facilities will reduce truck trips by 200 trips per day and eliminate the associated air quality impacts. **PMSA-1**

By approving this project, with the elements included in Alternative 5, the Port and the U.S. Army Corps of Engineers (USACE) will continue to support San Pedro Bay as the premier North American gateway for international imports and exports. The project also continues the environmental stewardship that has resulted in significant improvements in air quality for San Pedro Bay. The Port and USACE should move forward with this project as quickly as possible.

Sincerely,

Thomas Jelenić
Vice President

2.3.5.7 Pacific Merchant Shipping Association (PMSA)

Response to Comment PMSA-1

Thank you for your comment on the Draft EIS/EIR. LAHD and USACE acknowledge PMSA's support and review and, therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)). PMSA's support of Alternative 5 is noted and will be before the decision-makers for their consideration prior to taking any action on the proposed Project.

2.3.6 Individual/Company Comments

k_Draft EISEIR - Berths 226-236 Everport Container Terminal Improvements Project POLA Website Referral

From: Michelle Kosik <kosikfl@mail.com>
Sent: Wednesday, May 03, 2017 5:21 PM
To: Stevens, Theresa CIV USARMY CESPL (US)
Subject: [Non-DoD Source] Draft EIS/EIR - Berths 226-236 [Everport] Container Terminal Improvements Project/POLA Website Referral

No you can not force me and now I have it documented
Michelle Kosik
561-215-8253

MK-1

Sent from my iPhone

2.3.6.1 Michelle Kosik (MK)

Response to Comment MK-1

The comment is noted. The comment does not specifically deal with the proposed Project or the information presented in the Draft EIS-EIR. Therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

From: ibrahimaadji1 [mailto:ibrahimaadji1@gmail.com]
Sent: Sunday, May 07, 2017 3:55 AM
To: Ceqacomments
Subject: Draft EIS/EIR - Berths 226-236 [Everport] Container Terminal Improvements Project/POLA Website Referral

Hi to every one how was your pola i'm so happy to see the informations about pola **IB-1**

2.3.6.2 ibrahimaadji1 (IB)

Response to Comment IB-1

Thank you for your comment on the Draft EIS/EIR. The comment does not specifically deal with the proposed Project or the information presented in the Draft EIS-EIR. Therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

-----Original Message-----
From: Stephane de Bord [mailto:stephane.debord@gmail.com]
Sent: Monday, May 15, 2017 3:27 PM
To: Ceqacomments
Subject: Berths 212-224 [YTI] Container Terminal Improvements Project

Dear Mr. Cannon,
I am writing regarding the Everport Container Terminal Project at the Port of Los Angeles. I am trying to get a sense of the impact to coastal wetlands/marshlands of this project and whether it will require the port to acquire mitigation credits in order to offset any potential impact. I am with Hellman Properties LLC, an independent oil operator in Orange County, we are considering a mitigation land bank project in the area. I am trying to understand how much demand there is for such credits in the marketplace. Presumably the Port of Los Angeles would be one of the large purchasers of mitigation credits given the volume of projects they are undertaking. In case the Everport project does not require any credits, but you know of other projects who would, I would be interested in learning about those as well. If you are not the right person to talk to about this, could you possibly steer me to the right person at the Port of Los Angeles. Thank you.

HP-1

Best,

Stephane
Manager
Hellman Properties LLC
415-225-5456
Best,

Stephane
415-225-5456

2.3.6.3 Hellman Properties (HP)

Response to Comment HP-1

The questions and comments are noted. The USACE has reviewed the various mitigation banks and available credits that occur in the Los Angeles District area of responsibility. The USACE has concluded the proposed Project's biological and aquatic resource mitigation requirements cannot be covered by any existing USACE-approved mitigation bank. Further, the LAHD is not required to establish a mitigation bank (or purchase mitigation bank credits) to address aquatic resource impacts (refer to Section 3.3, Biological Resources, of the Draft EIS/EIR for a detailed analysis of biological resources). The comments do not identify any specific deficiencies or contest the adequacy of the Draft EIS/EIR; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

June 1, 2017

Chris Cannon
Director, Environmental Management
Port of Los Angeles
P.O. Box 151
San Pedro, CA 90733

Theresa Stevens, Ph.D.
Los Angeles District, Regulatory Division
U.S. Army Corps of Engineers
2151 Alessandro Dr., Ste. 110
Ventura, CA 93001

SUBJECT: Berths 226-236 [Everport] Container Terminal Improvements Project

Dear Mr. Cannon & Dr. Stevens,

The Valley Industry and Commerce Association (VICA) supports the proposed Berths 226-236 [Everport] Container Terminal Improvements Project, which would improve conditions of Berths 226-236 on Terminal Island in the Port of Los Angeles.

The Port of Los Angeles has the highest total two-way trade value of any port in the United States and is one of the world's largest trade gateways. The economic contributions the Port brings at the local, state, and national levels are significant and improvements are necessary to ensure the safety and efficacy of Port operations.

Due to increased demands for goods, larger vessels are being deployed to reduce container shipping costs. The improvements proposed by the Everport Project will help ensure that the Port is well-equipped to handle these larger vessels. The Everport Project will also spur economic growth by creating new jobs – both in the execution of the project and staffing of the expanded terminals.

VICA-1

The movement of goods is a major economic driver in California. The Port of Los Angeles already facilitates significant international trade and domestic goods movement demands. The Everport Project will help strengthen our region's economic standing and promote business growth throughout Southern California. For these reasons, VICA supports the Everport Container Terminal Improvements Project.

Sincerely,

Kevin Tamaki
VICA Chair

Stuart Waldman
VICA President

2.3.6.4 Valley Industry and Commerce Association (VICA)

Response to Comment VICA-1

Thank you for your comment on the Draft EIS/EIR. LAHD and USACE acknowledge VICA's support and review; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

MANSON CONSTRUCTION CO.

340 GOLDEN SHORE, SUITE 310, • LONG BEACH, CALIFORNIA 90802 (562) 983-2340
CALIFORNIA CONTRACTOR'S LICENSE #A-220319 • FAX (562) 436-2156

June 5, 2017

BY EMAIL

U.S. Army Corps of Engineers
Los Angeles District, Regulatory Division,
Ventura Field Office
2151 Alessandro Drive, Suite 110
Ventura, CA 93001

Attention: Ms. Theresa Stevens, Ph. D.

Port of Los Angeles
P.O. Box 151
San Pedro, CA 90733-0151

Attention: Mr. Christopher Cannon, Director of Environmental Management

Subject: Berths 226 to 236 [Everport] Container Terminal Improvements Project Draft EIS/EIR

Dear Ms. Stevens and Mr. Cannon,

Manson Construction Co. ("Manson") has reviewed with interest the subject Draft EIS/EIR and offers its comments for public consideration.

The project sponsors are ***not seeking to take advantage of air emissions reductions from electric powered dredges*** despite the statement on page ES-62 that

> *"Construction emissions would make a cumulatively considerable and unavoidable contribution to a significant cumulative impact for NOx and VOC emissions under CEQA and under NEPA"*

MCC-1

and

> *"Construction would also result in cumulatively considerable and unavoidable contribution to a significant cumulative impact related to ambient NO2 levels under CEQA and NEPA"*

SAN FRANCISCO OFFICE
200 Cutting Boulevard
Richmond, California 94804-2128
Phone (510) 232-6319
Fax (510) 232-4528
California License # A-220319

SEATTLE OFFICE
5209 East Marginal Way S.
Seattle, WA 98134
Phone (206) 762-0850
Fax (206) 764-8595
WA License # MANSOCC032M1

JACKSONVILLE OFFICE
4309 Pablo Oaks Court, Suite 1
Jacksonville, Florida 32224
Phone (904) 821-0211

Electric powered dredges are now-established practice in the Ports of Los Angeles and Long Beach however this project does not require the use of an electric powered dredge. For the proposed project, "Marine Source Exhaust", which we assume would include dredges, are indicated to be a significant contributor to air emissions (see for example Table 3.2-10A, page 3.2-25). Electric dredges will reduce Marine Source Exhaust emissions and alleviate the "considerable and unavoidable" impacts to air emissions noted in the Draft EIS/EIR.

MCC-1 cont.

The dredge industry, and Manson in particular, has made considerable capital investment in electric dredge equipment to meet customer needs to lower construction air emissions. Electric dredge equipment capable of performing the proposed work exists and is immediately available. Back sliding on requirements for electric dredging and creation of uncertainty for demand for electric dredge equipment reduces incentives to industry to make this equipment available to its customers at competitive rates. Continued commitment to this technology by project sponsors will encourage capital investment and betterment of available technology to lower the cost of its air emission benefits.

Manson suggests the project sponsors evaluate the potential to mitigate construction air emissions from this project by use of electric dredges. We are available to provide to you information we might have to assist in your review.

Sincerely,
MANSON CONSTRUCTION CO.

George H. Atkinson
Vice President and Southern California Area Manager

2.3.6.5 Manson Construction Company (MCC)

Response to Comment MCC-1

The comment is noted. LAHD has considered the use of the electric dredge and will be including it into the bid specifications for this project. The use of the electric dredge is subject to availability. The air quality analysis was not changed to account for this inclusion and is therefore conservative in terms of construction-related emissions.

2.3.7 Draft EIS/EIR Public Hearing

CERTIFIED COPY

IN RE THE MATTER OF THE PORT OF)
LOS ANGELES BERTHS 226-236 (EVERPORT))
CONTAINER TERMINAL IMPROVEMENTS)
PROJECT NOTICE OF AVAILABILITY OF)
DRAFT ENVIRONMENTAL IMPACT STATEMENT/)
ENVIRONMENTAL IMPACT REPORT HEARING.)
)

Transcript of Port of Los Angeles
Berths 226-236 (EVERPORT) Container
Terminal Improvements Project Hearing
Wednesday, May 10, 2017
San Pedro, California

SNYDER HEATHCOTE INC.

REPORTED BY Jamie L. Apodaca
CSR 10990

OUR FILE NO.

OFFICIAL COURT REPORTERS
3055 WILSHIRE BOULEVARD
SUITE 640
LOS ANGELES, CA 90010
TELEPHONE (213) 388-2151

IN RE THE MATTER OF THE PORT OF LOS ANGELES BERTHS 226-236 (EVERPORT) CONTAINER TERMINAL IMPROVEMENTS PROJECT NOTICE OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT STATEMENT/ ENVIRONMENTAL IMPACT REPORT HEARING.

Transcript of the Port of Los Angeles Berths 226-236 (EVERPORT) Container Terminal Improvements Project Notice of Availability of a Draft Environmental Impact Statement/Environmental Impact Report hearing held at 6:07 P.M. on Wednesday, May 10, 2017, at 425 South Palos Verdes Street, Second Floor, San Pedro, California, before Jamie L. Apodaca, CSR #10990.

APPEARANCES:

Christopher Cannon

Theresa Stevens

Tara Tisopulos

WEDNESDAY, MAY 10, 2017; SAN PEDRO, CALIFORNIA

MR. CANNON: Okay. We might as well get started since we have a rousing audience tonight. We are nevertheless going to go through our process that we go through. We'll describe the project, and you'll be able to offer any public comments if you have any.

So, but my job is really to welcome everybody and to remind everyone that this is a public hearing for the CEQA process. Its purpose is for people to give comments on the E.I.S./E.I.R. So it's both the NEPA and CEQA process. That's the Federal and State process.

The purpose of this type of meeting is for people to, number one, hear about the project; and, number two, if they have any comments, to provide them. We are not going to answer any questions nor will we provide any dialogue, but we will take notes.

I want to also note that there's Spanish translation available tonight if it's necessary, and we also have a court reporter, or a recorder, here. So if anybody is going to be providing comments, say your name clearly and speak slowly so that the person who is doing the recording can get your comments and get what you have to say clearly. And so as I say, I leave it with that. I think we'll move on to our process.

I'm Chris Cannon, the Directer of Environmental Management for the Port of Los Angeles. The two people who are going to be doing presentations tonight are Theresa Stevens with the United States Army Corps of Engineers and Terry Tisopulos, who is the project manager for the Harbor Department.

So with that, I'd like to turn it over to Theresa Stevens with the Army Corps of Engineers to begin our presentation tonight.

Theresa?

MS. STEVENS: Good evening, everybody. My name is Theresa Stevens. I'm the U.S. Army Corps of Engineers project manager for this project. On behalf of the Corps of Engineers, Los Angeles District, I'd like to welcome you to this meeting.

In 2013, the Los Angeles Harbor Department applied to the Corps for permits to construct wharf and terminal improvements at the berths 226 to 236, Everport Container terminal, which is located adjacent to the main channel.

Because the Federal permits qualify as Federal actions, the Corps must also comply with the National Environmental Policy Act, also known as NEPA. Due to the nature and scope of the proposed activities in waters of the United States, the Corps has determined the proposed project could result in significant direct, indirect, or cumulative

impacts. As such, we were required to prepare an environmental impact statement, or an E.I.S.

On October 24th, 2014, we published a Notice of Intent to Prepare an E.I.S. in the Federal Register. At tonight's meeting, the Corps and the Los Angeles Harbor Department will accept comments on the draft E.I.S./E.I.R. whose comment period started on April 5th -- sorry -- April 21st. Whoopsie.

Under our Federal permit program, the Corps of Engineers is responsible for regulating discharges of dredged and fill material in waters of the United States, as well as any activities such as dredging or structures that may affect navigation. The proposed in-water and over-water activities at the Berths 226 to 236 area are regulated under Section 10 of the Rivers and Harbors Act and Section 404 of the Clean Water Act.

The Harbor Department is also considering transporting and discharging dredged material at the EPA-approved ocean disposal site known as LA-2. This action must comply with the regulations of Section 103 of the Marine Protection Research and Sanctuaries Acts.

To this end, the Harbor Department has tested the sediment that would be dredged, and an inter-agency team has reviewed the sediment test results. As a result of the testing, the interagency team has found the dredged material

is suitable for ocean disposal.

Federal actions such as Corps permit decisions are subject to compliance with a variety of Federal environmental law in addition to NEPA. Consequently, the Corps has the responsibility to evaluate the direct, indirect, and cumulative environmental impacts that would result from the proposed project prior to making a permit decision. In meeting its regulatory responsibility, the Corps is neither a project proponent nor an opponent.

In addition to evaluating the impacts, the Corps must determine whether the proposed project is in the public interest. No permit can be granted if we find that the proposal is contrary to the public interest. The public-interest determination requires a careful weighing of factors relevant to the particular project. The public interest is satisfied in part by public comments on the E.I.S.

Public-interest review requires evaluation of short-term and long-term project benefits, and the Corps is required to balance these benefits against a project's reasonably foreseeable detriments.

The Corps would like to emphasize that we will accept and carefully consider all comments that we receive tonight, and they will be given full consideration as we prepare the final E.I.S.

Following tonight's meeting, all parties will be given until June 5th, 2017, to provide written comments on the environmental analysis of the proposed project and project alternatives.

Now, I have a little statement here about the logistics of taking testimony. So if you know you would like to speak tonight, please fill out a speaker card, and you can hand it to me or to one of the staff at the front desk or back where the sign-in sheets are. This will help us to transition to the public input session after the slide presentation.

All oral or written testimony will become part of the administrative record for this permit application, and as you make your comments, I'll just note that there's a timer on the stage here. So please respect the time limits so that everyone who would like to speak would have time to do so. The timer is a three-minute timer. The green light goes on; three minutes, you have; and by the time the red light comes on, you need to wrap it up. So following the presentation by port staff, we'll take comments from anyone who would like to speak.

Thank you.

MS. TISOPULOS: Okay. Thank you for being here. We're a small group, but we are mighty.

My name is Tara Tisopulos. I actually am the

project manager. Happy to be part of the environmental management team here at the port.

Chris touched on quite a bit of this in his opening remarks, but the purpose of why you're here -- although if you're here, you probably know why you're here -- is to provide information to you on the berth 226-236 improvement project; to provide an overview of our analysis and the findings made on the draft E.I.R./E.I.S.; and we of course want to hear your public comments. As Chris mentioned, we do have a Spanish translator if anyone needs it.

So here is our location, right across from us here in the main channel; so the site is in the main channel on Terminal Island. As you can see, you can look out the door and see it quite clearly. Its surrounding facilities are the Y.T.I. Container terminal; P.B.F. Energy, which you may probably know better as the former ExxonMobil facility; and Tri-Marine.

So this is what the facility looks like barring any improvements right now. This is what it looks like in its current, existing condition. It has two operating berths, eight operating cranes. It encompasses a footprint of approximately 205 acres, including about 25 acres that are currently being used at the site, not within their leasehold but on a temporary basis. And it also includes the Terminal Island Container Transfer facility, which as you can see is

the rail yard behind the Y.T.I. facility, which is Berths 217 to 220.

So currently in terms of amp, we have three amp vaults at the site. We have a permit that will allow them to operate a lease through 2028. Their capacity at the existing condition is about 8,000 TEU vessels. They're through-put in the year 2013, which is the year that we used as our baseline year in this analysis, was approximately 1.2 million TEUs. But with no change to the existing condition at the site, they would have been able to operate up to about 1.8 million TEUs.

So the overall purpose of the project, the global purpose, is of course to be able to optimize the infrastructure to accommodate future cargo volumes and particularly to accommodate the larger container ships expected to call.

So the way we achieve this project purpose is to provide the depth necessary at the berths to accommodate the ships, provide the adequate-sized cranes to accommodate the ships, increase the container terminal backland capacity, and increase the amp vaults so that the facility has a greater potential for plug-in.

Here is our project description. I just want to go over briefly all the colored areas, because they may be -- for me with my vision, they're very hard to read. So I just

want to go over them in case they are for you.

The red area is the terminal's -- what the terminal's footprint would look like under the proposed project. The green shading, which of course is in the main channel, would be the dredging that will occur at 226 to 229; and the bright-pink shading, also in the water, would occur at 230 to 232. The yellow indicates an area currently being used by the facility under a temporary lease that will be subsumed into this lease amendment, and the blue shading is your backland improvements that will occur along with the street improvements that are necessary in that area.

So with the increase in backland, we will end up with a facility footprint of approximately 229 acres. There would be -- in terms of also improvements to the site, we would have a modified new gate complex, and the development would require the demolition of some existing structures, some street closures, and improvements to Cannery Street.

So along with that development, more specifically on the street improvement, we may be closing portions of Terminal Way, Barracuda, Tuna, and Ways Street, just within that project area, and rerouteing Terminal Way traffic to Cannery Street.

Further on the project components, we have the installation of five new amp vaults which would make a total of eight at the site.

The amendment to the lease -- as we've said, we'll extend it out to -- the amendment -- the lease would currently close in 2028. We would be extending it out to 2038, including the 25 acres that are being used at the site on a temporary basis, as well as the 23.5 acres that constitute the new backlands.

So obviously the ultimate goal, again, is to be able to be ready and accommodate larger vessels that call -- that are expected to call in the future.

So at full build-out of the project, the project will be able to accommodate approximately just short of 2.4 million TEUs per year, which is an increase of about 5 -- a little over 579,000 TEUs per year. In order to accommodate that, we will have five new cranes, and we will potentially need to raise five existing cranes.

So here we are in the environmental review process, which I'm sure many of you are familiar with. But just to go over it briefly, this slide highlights where we are -- Notice of Intent; Notice of Preparation was released in 2014 with a scoping meeting held in November of 2014. The draft E.I.R./E.I.S. was released on April 20th.

And where we stand today -- on May 10th -- this is our public hearing where we are soliciting your input on the project. A tentative time frame has been set for September of 2017 to bring this document to our Harbor Commission for

final consideration.

So project alternatives. CEQA and NEPA do require an analysis of a reasonable range of alternatives to the project that could meet the objectives of the project while potentially having less significant impacts or, even less, avoiding any impacts. So we have evaluated the following five alternatives.

We have the "No Project," and we have the "No Federal Action," which basically allow the public and decision-makers to assess the effects of approving the project versus the effects of not going forward with any project at all, where the facility would basically be left at its existing setting/condition;

The "Reduced Wharf Alternative," which is -- which would still allow for two operating berths, which is what they have now, but would leave Berth 230 to 232 and not allow for any dredging. It would remain at its existing depth; so this alternative would actually result in a lower through-put capacity than what we have with the proposed project. The "Reduced Wharf Alternative" would still allow for two operating berths but would leave 230 and --

I'm sorry. The "Backland Alternative" would not improve or relocate the gate complex and would not allow the addition of the backlands expansion area; so as a result of that, this alternative would also result in lower through-put

capacity than what could be achieved with the proposed project.

And our last alternative is an "Expanded On-Dock Rail," which includes all of the identical components of the project and can still achieve the same capacity of the project with very similar environmental effects.

So in order to assess -- and this room may understand this, but just to clarify -- before we discuss an environmental impact associated with the project, it's important to understand how environmental impacts are characterized.

So a designation of "No Impact" is what we say when we have absolutely no adverse change to an environmental resource that is identified or expected from the project.

We have a "Less-than-Significant Impact" would be identified when the project would not cause a substantial effect to the environment with or without mitigation.

"Potentially Significant" is really more of an N.O.P. term that we use to identify when we are doing an assessment of an environmental resource to determine what needs to be further analyzed.

MR. CANNON: "Notice of Preparation."

MS. TISOPULOS: I'm sorry. It's a notice of the Notice of Preparation Initial Study. So a "Significant and Unavoidable Impact" represents an impact that will remain

above a set, significant threshold, even if mitigation is imposed.

So what is a threshold of mitigation for the Harbor Department? And the U.S. Army Corps of Engineers, I should say, has also accepted the thresholds of "significant" adopted by the Harbor Department.

The threshold of significance for most of our resource areas are set and determined and utilized by the City of Los Angeles CEQA guidelines. Other thresholds, however, are established by regulatory agencies that have an expertise in a particular field, such as L.A.D.O.T. or S.C.A.Q.M.D., and in that case, we do defer to their expertise.

So through the initial study and notice of preparation process, it was determined that a number of resource areas in the draft E.I.R. would not be significantly impacted by the proposed project. So these were the environmental areas assessed but deemed less-than-significant, either with or without mitigation, and that would be esthetics, groundwater and soils, hazards, marine transportation, noise, socioeconomics, and water quality.

So this is where we stand with environmental impacts that do remain significant and unavoidable as a result of the proposed project. We identified significant impacts in the

areas of air quality, biological resources, cultural resources, greenhouse gases, and transportation. However, I would like to note that under "Air Quality," a full health-risk assessment was performed for the project and found that the cancer risk associated is less than 10 in 1 million under both our CEQA and NEPA analyses, and 10 in 1 million is the significance threshold that we use.

So environmental justice -- which for our purposes is an environmental category, but it's important to note it was found to be significant and unavoidable under NEPA. So this item is really more for your information, but there's some exiting things that are going on at the Everport Container terminal, or will be in the near future.

The terminal, along with the Harbor Department, has recently been awarded two separate grants through the California Energy Commission for demonstration projects that will test thirty pieces of equipment, including twenty zero-emission-equivalent yard tractors, eight battery-electric yard tractors, and two battery-electric top picks.

So what's exciting about this is that depending on the results of these demonstration projects, this equipment really may prove to be a feasible option in the future. Testing won't begin probably for the next 18 months, and it will last at least a 12-month period.

So here is where we get to our submittal of public comments. As we've already stated, the public comments should be postmarked into the port or the Harbor Commission by June 5th. Written responses, as you may know, will be prepared for all comments or questions received either this evening or as well as any comments received subsequent to the hearing, and they will be included for your review in the final E.I.R./E.I.S.

And with that, I'm going to open it to public testimony. Do we have any public speakers?

Do we have one speaker?

UNIDENTIFIED VOICE: We have a few. Actually, three.

MS. TISOPULOS: Okay. Can you state your name for the record.

MS. PERRELLA: Good evening. Melissa Lin Perrella with the Natural Resources Defense Counsel.

Thank you to the Port of L.A. and for the Army Corps of Engineers for having the public hearing tonight and providing a few slides. I particularly appreciated the update on some of the zero-emission technologies that will be featured at the port.

One comment that I wanted to make -- and I'm still reviewing the E.I.R. -- is I notice that there will be --

PH1-1

And I think one of your slides featured it.

-- an approximate increase of about 580,000

additional TEUs from the project, and, relatedly, approximately 2,200 additional daily truck trips.

I didn't see a discussion of mitigation for trucks within the E.I.R., at least upon my preliminary review, and would like the Army Corps and the Port of L.A. to provide some mitigation for trucks -- at least have a thorough consideration of it in the environmental document. PH1-1 cont.

In addition, I noticed that there was, in one of the charts, a listing of approximately 130,000 TEUs that could go to peel-off yards. I know I personally have had some discussions with the Port of L.A. -- I think others have as well -- in terms of trying to create some kind of zero-emission fleet that could travel to these nearby peel-off yards. So I'm hoping that the port and the Army Corps can consider that as well. Thank you. PH1-2

MS. TISOPULOS: Thank you so much.

Jesse Marquez?

MR. MARQUEZ: Hello. Jesse Marquez with the Coalition for a Safe Environment, an environmental justice organization headquartered here in Wilmington and the Harbor.

I haven't had a chance to review everything, but I did want to also suggest that we are expecting to see that there is a commitment by the port for zero-emission trucks that would be servicing the facility, and this would be the on-road trucks and fleets that could be dedicated towards PH2-1

this.

Also, is there going to be a mitigation fund set up for TEU that would be able to address the off-port mitigations that would go towards the Harbor Community Benefit Foundation? So we'd like to see a commitment for that. PH2-2

In terms of the environmental justice, I didn't really see or catch at this point any type of environmental justice analysis or an opportunity for environmental justice organizations and representatives to speak as to what type of mitigation could be proposed that would address environmental justice commitments. PH2-3

The other thing is that there are many off-port and off-project activities that take place, such as container storage yards. Well, since the port has gone in the direction of expanding that type of business, then it forces the tenants to have to use off-port facilities, and in the last assessment that we did in Wilmington, we counted over 100 container storage yards. PH2-4

Now, we don't know if some of them are legitimate because of fact that they're also a warehouse facility doing that, but we do need to have an assessment of off-port container storage yards, off-port chassis storage yards, off-port yards that also handle the true refrigeration units. I do see some where you can see them literally being stacked

there. It also appears that there is maintenance of containers going on, maintenance of trucks going on, and maintenance of the true units at these container storage yards.

Because what's happening is the fact that, you know, we have the typical truck transportation routes and destinations, but we don't have all these other off-road activities which are contributing to an underestimation of, you know, the emissions and of the environmental and community impacts. PH2-4 cont.

Also, when things go into a container storage yard, some of these are the reefer types, which means that, you know, sometimes they're going to be stored there indefinitely, which is why we call them container graveyards, which means that they'll also not be evacuated of any of the HFCs, which means these are additional greenhouse gases that go. PH2-5

In addition, as trucks gets older that are A.C., well, they also start emitting more greenhouse gases as they release. So we'd like to see that taken care of. PH2-6

And then we'd like to also identify other types of service, like are there off-port inspection going on in Wilmington and San Pedro-Harbor City that we should be aware of. Thank you. PH2-7

MS. TISOPULOS: Thank you so much.

Kathleen Woodfield.

MS. WOODFIELD: Thank you. I'm Kathleen, with a "K," Woodfield from San Pedro Peninsula Homeowners Coalition. I came here to learn about the project. I have not read it, but I found the presentation to be so skeletal and so fast that I didn't actually learn a whole lot for me to be able to comment in a meaningful manner, which I find personally to be a disappointment.

What I do -- one thing that stands out to me is that this is a project that is right along the view shed of the community. So it spreads out here in front of Ports o' Call, basically. And I don't agree that you can find an "insignificant" impact to esthetics when you are doubling the amount of cranes and raising cranes. So I would ask you to look at that again, because I don't think that's possible to have the "insignificant" impact when it's such a significant change. And even one crane is huge, never mind five. PH3-1

So -- well, so to increase the backlands, I don't know if we would be able to see that really much from the community side, but that is a tourist area -- the Ports o' Call -- and so any esthetic impact would be significant, and so I don't want that to be underrated.

And as far as adding anything additional, that has already been said. That's about it, but I would like to say again that I was expecting more substantive information, and

then the information that was substantive, it went by so fast that I couldn't take notes on it or really take it in.

PH3-1 cont.

But I'm -- for instance, I don't even know how much increase in acres you're -- is it a 23-acre increase? I'm not sure. But, anyway --

MR. CANNON: 23.5

MS. WHITFIELD: Okay. And the other thing I don't understand is how if you're doubling the cranes, how come you're not doubling the capacity, the through-put capacity. So that's a mathematical question I have. It doesn't really make sense to me. Thank you.

PH3-2

MS. TISOPULOS: Thank you.

Okay. I don't know where he went.

I might say your last name wrong. David Therrien? I'm sorry if I just ruined your last name.

MR. THERRIEN: My name is David Therrien. I live at 111 North Harbor Boulevard, directly across the street from -- from the Evergreen terminal. I'm concerned about a few things.

I guess the first is sound that comes out. I live down -- my art studio is right across the street, like I said. I hear container activity all night long -- trucking activity; backup -- kind of backup alarms -- things like that -- constantly. I actually can hear them all the way from the China Shipping terminal, but a lot of them are

PH4-1

directly from the Evergreen terminal. For me to hear them where I'm at, they're over the decibel limit that's allowable under the regular code.

And so I would like to see something to kind of mitigate some of that sound, whether the back-up alarms and things like that are minimized at night, say after 10:00 or 11:00 o'clock at night and then don't start again until the morning. PH4-1 cont.

They drop quite a few containers. They're smashing them as they're either loading or unloading. I'm not sure if there's anything that they can do to change that, but I'm concerned about that becoming absolutely constant at night.

Number two, I've been taking dust samples from my yard, which is right across the street. I have an incredibly high diesel-particulate dust and fumes where I'm at, which is -- I mean, it's, again, like I'm saying, right across the street. But the Projects are right behind me, and so they also are breathing in all that dust, and it's depositing on everybody in the neighborhood. PH4-2

So I want to know how that can be mitigated, whether that's being tested at all in the areas that people are living right across the street and also would like to hear more about how they can change the trucking that's going on over there.

There's no reason -- I mean, in Europe in a lot of

the ports now, all of the vehicles are electric, and why we have diesel trucks still running at our port escapes me. It just seems that if we want to show that we really do have the best port in America, we have to switch over to electric trucks. Thank you. PH4-2 cont.

MS. TISOPULOS: Thank you so much.

Do we have any other public testimony?

Well, seeing none, I would really truly like to thank you all for being here and taking time out of your evening, and I would like to now then officially close the hearing. Thank you.

(Whereupon the hearing was adjourned at 6:33 P.M.)

STATE OF)
) SS.
CALIFORNIA)

I, Jamie L. Apodaca, Certified Shorthand Reporter in and for the State of California, do hereby certify:

That the above hearing was taken down by me in stenographic form and thereafter reduced to computerized transcription. I further certify the foregoing hearing is a full, true, and correct transcript of my stenographic notes and that dismantling, unsealing, or unbinding of this transcript will render this certificate null and void.

I further certify that I am neither counsel for nor related to nor employed by any of the parties in said action; and furthermore that I am not a relative or employee of any attorney or counsel employed by the parties hereto or in anywise interested in the outcome thereof.

IN WITNESS WHEREOF, I have hereunto set my hand this 19th day of May, 2017.

Jamie L Apodaca

CSR No. 10990

2.3.7.1 Everport Public Hearing Transcript (PH)

Response to Comment PH1-1

The comment is noted. Please see Response to Comment NRDC-3 for information responding to this comment.

Response to Comment PH1-2

The comment is noted. Please see Response to Comment NRDC-3 for information responding to this comment.

Response to Comment PH2-1

The comment is noted. Please see Master Response 2: Zero-Emission Technologies and Response to Comments CFSE-11, CFSE-15, CFSE-21, and CFSE-22 for information responding to this comment.

Response to Comment PH2-2

The comment is noted. Please see Response to Comments CFSE-19 and CFSE-27 for information responding to this comment.

Response to Comment PH2-3

The comment is noted. Chapter 5, Environmental Justice, of the Draft EIS/EIR, evaluates whether the proposed Project and its alternatives would result in disproportionately high and adverse human health or environmental impacts on minority populations and/or low-income populations in the local communities surrounding the Port. The environmental justice analysis complies with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, and the Council on Environmental Quality's (CEQ) Guidance for Environmental Justice Under NEPA (CEQ, 1997), which requires federal agencies to assess the potential for their actions to have disproportionately high and adverse environmental and health impacts on minority populations and/or low-income populations. The environmental assessment in Chapter 5 is also consistent with California state law regarding environmental justice. In addition, please see Response to Comments CFSE-19, CFSE-24, and CFSE-25 for information responding to this comment.

Response to Comment PH2-4

The comment is noted. Please see Response to Comment CFSE-7 for information responding to this comment.

Response to Comment PH2-5

The comment is noted. The Everport Container Terminal does not operate off-site container storage yards in the Wilmington Community, and would not store refrigerated containers at such yards under any of the project alternatives. There may be third-party facilities that purchase or rent used shipping containers and refrigerated containers, and if so, they would be responsible for properly managing refrigerants and conducting their business in accordance with local ordinances.

Response to Comment PH2-6

The comment is noted. The Ports of Los Angeles and Long Beach have implemented the Clean Truck Program to address the issue of higher emission trucks, including mobile coolant emissions, hauling containers through the Port Complex. The Port will be advancing the Clean Truck Program (per the 2017 CAAP update) to further phase out older trucks and transition to clean trucks and zero-emission trucks. The 2017 Draft CAAP Update indicates that starting in 2018, new trucks entering the Port's drayage truck registry must have a 2014 model year engine or newer, starting when the State's near-zero-emission heavy-duty engine standard takes effect new truck entering the terminal must meet this standard and all other trucks will be charged a rate to enter except those that meet the near-zero standard. Note that these requirements will be applied port-wide. Further, the 2017 Draft CAAP update establishes GHG reduction target from port-related sources of 80 percent below 1990 levels by 2050. Since the 2017 CAAP Update has not yet been formally adopted, no reduction credits are taken for the policies and goals included in the update (POLA and POLB, 2017).

Response to Comment PH2-7

The comment is noted. Regarding identifying other types of services, such as off-port inspections, because those sources are not Project components, they are not included in the Draft EIS/EIR.

Response to Comment PH3-1

The comment is noted. As detailed in Section 3.1.4.1 (beginning on page 3.1-14) in Chapter 3.1, Aesthetics, of the Draft EIS/EIR, an assessment of visual and aesthetic changes under the proposed Project was conducted using federal, state, and local guidance, and visual simulations. Federal Highway Administration guidance was used to assess and analyze the character, quality, and sensitivity of views under existing and proposed Project conditions in consideration of the CEQA and NEPA requirements and the City of Los Angeles CEQA Thresholds Guide, which are further described below. A visual survey was conducted of the Port and neighboring areas to establish baseline (existing) visual and aesthetic conditions at three viewpoints to represent views from the adjacent community and Port's O'Call area. Existing and simulated images of the Project site and surrounding areas from these viewpoints are depicted in Figures 3.1-2 through 3.1-4. The simulated images illustrate how the Project site would appear after adding and modifying (raising) cranes at the Everport Container Terminal. The simulations involved the creation of crane models, which were based on the existing dimensions and color of the existing cranes at the Everport Container Terminal. The visual analysis determined that neither the proposed Project nor any of the alternatives would result in a significant impact on aesthetic resources (please refer to Section 3.1 for the detailed analysis). The comment does not identify any specific deficiencies or contest the adequacy of the Draft EIS/EIR; therefore, no further response is required (PRC 21091(d); State CEQA Guidelines Section 15204(a); 40 CFR 1503.4 (a)(5)).

Response to Comment PH3-2

The comment is noted. The commenter is incorrect that the proposed Project would double the number of cranes. As described throughout the Draft EIS/EIR, the existing terminal operates with eight 100-foot gauge wharf gantry cranes. The proposed Project proposes to add five new 100-foot gauge wharf gantry cranes and the raising of up to five of the existing operating cranes, for a total of 13 cranes (refer to Table 3.1-1 in Section 3.1 of the Draft EIS/IR for details on the existing and proposed cranes. The terminal's capacity under the proposed Project would increase from 1,818,000 TEUs per year to 2,379,525 TEUs per year (see Chapter 2 of the Draft EIS/EIR), or an increase of 561,525 TEUs (an approximately 31 percent increase). Several key factors play a role in determining a container terminal's capacity, including the amount of backlands (contributes to a terminal's ability to store and transfer containers), the wharf length (limits the

length of vessels that can berth), the berth depths (limits the draft of the vessels that can berth), crane numbers (contributes to the loading and unloading of vessels), and crane size (contributes to the vessel size limits that can be accommodated). Other factors that also contribute to a terminal's throughput capacity include the performance rating of the cranes (such as lifts per hour). Because there are many different combinations of these factors, the number or cranes is not a sole determiner of a terminal's capacity.

Response to Comment PH4-1

The comment is noted. Receptor location LT-3 is representative of the commenter's studio due to proximity, and the Draft EIS/EIR describes the existing ambient noise levels at this receptor in Section 3.10 (page 3.10-14 and 3.10-15). The evaluation of operational noise from the proposed Project under Impact NOI-3 starting on page 3.10-30 of the Draft EIS/EIR evaluates the anticipated noise increase at receptor LT-3 and determined that the increase would not exceed the significance threshold level, in part due to attenuation with distance (the terminal is approximately 1,800 feet from the commenter's studio) and given the existing ambient noise levels at the receptor location. It should be noted that although the terminal sounds can be heard at the commenter's location, the resulting sound level at the receptor location would not exceed the significance threshold level and would not require mitigation.

Response to Comment PH4-2

The comment is noted. Regarding the comment about diesel particulates in samples, the receptor location is adjacent to Harbor Boulevard, which is a main roadway in the Port area that is used by diesel powered vehicles, and in close proximity to the Main Channel, which is used by diesel powered marine vessels. Because of this and the nature of Port area and vicinity, diesel particulate matter present in the area. The Port is implementing the 2010 CAAP. The Port, in conjunction with the Port of Long Beach, has implemented the Clean Truck Program to improve air quality in the area and region, and will continue efforts to improve air quality through the 2017 CAAP Update, which was released recently and is scheduled for a public hearing in late 2017. In addition, please see Master Response 1 - Feasible Mitigation – Guidance and Applicability, Master Response 2: Zero-Emission Technologies, and the response to PH2-6 above.

Regarding the comment that the ports in Europe use electric trucks, the Port is not aware of any widely used heavy duty electric truck that services marine terminals in Europe. There have been activities seeking to develop electric on-road trucks using catenary systems in Europe (https://www.scania.com/group/en/worlds-first-electric-road-opens-in-sweden/); however, these activities would qualify more as demonstration projects due to the short length of electric-powered roadway. Further, such activities would require development and demonstration within the Port area before such a system can be considered. In addition, please see Master Response 2: Zero- Emission Technologies.

2.4 References

Following are additional materials referenced in the Section 2.3, Response to Comments, above:

- American Maglev Technology, Inc. 2008 Presentation to Port of Los Angeles. January 17. Available: https://www.portoflosangeles.org/Board/2008/January/011708_pres_maglev.pdfhttps://www.portoflosangeles.org/Board/2008/January/011708_pres_maglev.pdf. Accessed August 22, 2017.
- Council on Environmental Quality (CEQ). 1997. Environmental Justice; Guidance under the National Environmental Policy Act. Executive Office of the President, Washington, DC. December 10, 1997 (released July 1998).
- Los Angeles Department of Water and Power (LADWP). 2016. Power Integrated Resources Plan. December. Available: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=zf4mf87i4_4&_afrLoop=204372440300269. Accessed August 21, 2017.
- Los Angeles City Harbor Department (LAHD). 2016. Any soil import will adhere to LAHD's 2016. Environmental Guidance for Import Soil Requirements. June.
- ———. 2016. Final Initial Study/Negative Declaration Pasha Stevedoring and Terminals Lease Renewal Project. March.
- ———. 2010. Zero Emission Container Mover System Request for Concepts and Solutions: Evaluation Results. July 29
- ———. 2008. Port of Los Angeles. Sustainability Assessment and Plan Formation. June. Available: https://www.portoflosangeles.org/DOC/REPORT_Sustainability_Assessment_Plan_Formulation.pdf. Accessed August 21, 2017.
- Mercator International LLC and Oxford Economics. 2016. San Pedro Bay Long-term Unconstrained Cargo Forecast – Final Report for the Port of Los Angeles and Port of Long Beach. February.
- Ports of Los Angeles and Port of Long Beach (POLA and POLB). 2017. San Pedro Bay Ports Clean Air Action Plan 2017 DRAFT Final, July 2017. Available at: https://www.portoflosangeles.org/pdf/CAAP_2017_Draft_Document-Final.pdf. Accessed August 15, 2017.
- ———. POLA and POLB. 2017. San Pedro Bay Ports Clean Air Action Plan Fact Sheet. July 12. Available: http://www.cleanairactionplan.org/documents/clean-air-action-plan-2017-factsheet-7-12-17.pdfhttp://www.cleanairactionplan.org/documents/clean-air-action-plan-2017-factsheet-7-12-17.pdf. Accessed August 22, 2017.
- ———. 2011. Roadmap for Moving Forward with Zero Emission Strategies at the Ports of Long Beach and Los Angeles. August. Available: http://www.cleanairactionplan.org/documents/zero-emissions-roadmap-technical-report.pdf. Accessed August 21, 2017.
- Ramboll Environ. 2015. DRAFT Sampling and Analysis Report for Berths 226–232 in Support of the Everport Container Terminal Improvements Project, Los Angeles Harbor. Prepared for the Port of Los Angeles, San Pedro, CA. July 2015.

- SCAQMD. 2016. Personal communication, Philip M. Fine, Ph.D., Deputy Executive Direct, August 24, 2016. Letter to Mr. Chris Cannon, Director of
- Starcrest Consulting Group. 2015. – POLA CEQA Terminal Leve Container Ship Forecast for Tier 3 Engines – Final. August.2015 Everport Container Terminal Data.
- TIAX LLC. 2011. Technology Status Report – Zero Emission Drayage Trucks. Prepared for the Port of Long Beach and Port of Los Angeles. June.
- UCR, Center for Environmental Research and Technology. 2017. TSR Current Research webpage. Available: http://www.cert.ucr.edu/research/tsr/cr.htmlhttp://www.cert.ucr.edu/research/tsr/cr.html . Accessed August 21, 2017.
- U.S. Department of Transportation (USDOT). 2016. Freight Advanced Traveler Information System (FRATIS) Impact Assessment – Final Report. January 26. Available: https://ntl.bts.gov/lib/57000/57000/57031/FHWA-JPO-16-225.pdf. Accessed August 30, 2017.
- U.S. Environmental Protection Agency (USEPA). 2017. Revisions to the Guideline on Air Quality Models: Enhancements to the AERMOD Dispersion Modeling System and Incorporation of Approaches to Address Ozone and Fine Particulate Matter. 40 CFR Part 51. January 17.
- ——— Region IX and U.S. Army Corps of Engineers (USACE) Los Angeles District. 2005. Final Environmental Impact Statement (EIS) Site Designation of the LA-3 Ocean Dredged Material Disposal Site off Newport Bay, Orange County, California. With the Assistance of RECON Environmental. July.
- ———. 1988. Final Environmental Impact Statement for the Los Angeles/Long Beach (LA-2) Ocean Dredged Material Disposal Site Designation. July.

Chapter 3
Modifications to the Draft EIS/EIR

3.1 Introduction

This chapter of the document addresses modifications to the Draft EIS/EIR for the Berths 226-232 [Everport] Container Terminal Project (proposed Project) at the Port of Los Angeles (Port). It presents all revisions related to public comments, as determined necessary by the lead agencies, for the following areas of the document:

- Executive Summary
- Section 3.2, Air Quality and Meteorology
- Section 3.5, Greenhouse Gas Emissions
- Section 3.6, Ground Transportation
- Section 3.10, Noise
- Chapter 4, Cumulative Analysis
- Chapter 6, Comparison of Alternatives
- Appendix B1, Air Quality Regulations/Methodology and Air Quality and GHG Emission
- Appendix B.4, Draft General Conformity Determination
- Appendix F2, Evaluation of Dredged Material Disposal Option
- Additional Appendix - Investigation of 2033 HRA Start Year for the Everport Container Terminal Improvements Project

Any revisions to supporting documentation are also presented. The numbering format from the Draft EIS/EIR is maintained in the sections presented here. Only sections that have revisions based on public comment are included, and sections that have no revisions are not included. Readers are referred to the Draft EIS/EIR to view complete sections.

It should be noted that most of the changes were editorial in nature. Some mitigation measures were revised in response to agency requests. None of the edits result in changes to significance findings.

As provided in Section 15088(c) of the State CEQA Guidelines, responses to comments may take the form of a revision to a Draft EIR or may be separate section in the Final EIR. As provided in 40 CFR 1503.4(c), to comply with NEPA, responses to comments may take the form of revisions to a Draft EIS, or if changes to the EIS in responses to comments are minor, then changes may be provided on errata sheets attached to the Draft

EIS. This chapter complies with the latter of these two guidelines and provides changes to the Draft EIS/EIR in revision-mode text (i.e., deletions are shown with ~~strikethrough~~ and additions are shown with underline). These notations are meant to provide clarification, corrections, or minor revisions as needed as a result of public comments or because of changes in the proposed Project since the release of the Draft EIS/EIR.

3.2 Changes to the Draft EIS/EIR

The following changes to the text as presented below are incorporated into the Final EIS/EIR:

3.2.1 Changes Made to the Executive Summary

Section ES.5.2, Pages ES-27 to 37, Table ES-3

The rows under 3.2 Air Quality and Meteorology are revised, as follows:

Table ES-3: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

3.2 Air Quality and Meteorology				
Proposed Project	**AQ-1:** The proposed Project would result in construction-related emissions that exceed an SCAQMD threshold of significance in Table 3.2-6.	CEQA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for NO_X in 2019.	**MM AQ-1:** Harbor Craft Used During Construction. **MM AQ-2:** On-Road Trucks Used during Construction. **MM AQ-3:** Non-Road Construction Equipment. **MM AQ-4:** Cargo Ships Used During Construction. **MM AQ-5:** General Mitigation Measure.	CEQA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X in 2019.
		NEPA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for $PM_{2.5}$, NO_X, and VOC in 2019.		NEPA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X and VOC in 2019.
	AQ-2: Proposed Project construction would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-7.	CEQA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for NO_2 (federal 1-hour average) and PM_{10} (24-hour and annual average).	**MM AQ-1 through MM AQ-5**	CEQA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for NO_2 (federal 1-hour average) and PM_{10} (24-hour and annual average).
		NEPA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for NO_2 (federal 1-hour average).		NEPA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for NO_2 (federal 1-hour average).

	AQ-3: The proposed Project would result in operational emissions that exceed an SCAQMD threshold of significance in Table 3.2-8.	CEQA: Operations would be significant for NO_X in 2019~~, 2033, and 2038~~ and CO and VOC in 2033 and 2038.	**MM AQ-6:** Vessel Speed Reduction Program (VSRP). **MM AQ-7:** Alternative Maritime Power (AMP). **LM AQ-1:** Replacement of Equipment and Review of New Technology and Regulations. **LM AQ-2:** Priority Access System.	CEQA: Operations would be significant and unavoidable for CO and VOC in 2033 and 2038.
		NEPA: Operations would be significant for NO_X in 2019, 2026, 2033, and 2038; VOC in 2026, 2033, and 2038; and CO and $PM_{2.5}$ in 2033 and 2038.		NEPA: Operations would be significant and unavoidable for NO_X in 2026, 2033, 2038 and CO and VOC in 2033 and 2038.
	AQ-4: Proposed project operations would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-9.	CEQA: Operations would be significant for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).	**MM AQ-6 and MM AQ-7**	CEQA: Operations would be significant and unavoidable for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).
		NEPA: Operations would be significant for PM_{10} (24-hour and annual averages).		NEPA: Operations would be significant and unavoidable for PM_{10} (24-hour and annual averages).
	AQ-5: The proposed Project would not generate on-road traffic that would contribute to an exceedance of the 1-hour or 8-hour CO standards.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant		NEPA: Less than significant
	AQ-6: The proposed Project would not create an objectionable odor at the nearest sensitive receptor.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant		NEPA: Less than significant
	AQ-7: The proposed Project would expose receptors to significant levels of TACs.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: Construction and operation would be significant for individual cancer risk and population cancer burden.	**MM AQ-1 through MM AQ-7, LM AQ-1, and LM AQ-2**	NEPA: Less than significant
	AQ-8: The proposed Project would not conflict with or obstruct implementation of an applicable AQMP.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant.
		NEPA: Less than significant		NEPA: Less than significant

Alternative 1 - No Federal Action	**AQ-1:** Alternative 1 would result in construction-related emissions that exceed an SCAQMD threshold of significance in Table 3.2-6.	CEQA: Construction would be significant for NO_X in 2018. Overlapping construction and operations would be significant for NO_X in 2018 and 2019.	**MM AQ-1 through MM AQ-5**	CEQA: Less than significant.
		NEPA: No impact	Mitigation is not applicable	NEPA: No impact
	AQ-2: Alternative 1 construction would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-7.	CEQA: Construction would be significant for construction NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for PM_{10} (annual average).	**MM AQ-1 through MM AQ-5**	CEQA: Construction would be significant and unavoidable for construction NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for PM_{10} (annual average).
		NEPA: No impact.	Mitigation is not applicable	NEPA: No impact.
	AQ-3: Alternative 1 would result in operational emissions that exceed an SCAQMD threshold of significance in Table 3.2-8.	CEQA: Operations would be significant for NO_X in 2019~~, 2033, and 2038~~ and CO and VOC in 2033 and 2038.	**MM AQ-6 and MM AQ-7**	CEQA: Operations would be significant and unavoidable for CO and VOC in 2033 and 2038.
		NEPA: No impact	Mitigation is not applicable	NEPA: No impact.
	AQ-4: Alternative 1 operations would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-9.	CEQA: Operations would be significant for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).	**MM AQ-6 and MM AQ-7**	CEQA: Operations would be significant and unavoidable for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).
		NEPA: No impact	Mitigation is not applicable	NEPA: No impact
	AQ-5: Alternative 1 would not generate on-road traffic that would contribute to an exceedance of the 1-hour or 8-hour CO standards.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: No impact	Mitigation is not applicable	NEPA: No impact
	AQ-6: Alternative 1 would not create an objectionable odor at the nearest sensitive receptor.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: No impact	Mitigation is not applicable	NEPA: No impact
	AQ-7: Alternative 1 would not expose receptors to significant levels of TACs.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: No impact	Mitigation is not applicable	NEPA: No impact
	AQ-8: Alternative 1 would not conflict with or obstruct implementation of an applicable AQMP.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant	Mitigation is not applicable	NEPA: Less than significant

Alternative 2 – No Project	**AQ-1:** Alternative 2 would not result in construction-related emissions that exceed an SCAQMD threshold of significance in Table 3.2-6.	CEQA: No impact	CEQA: No mitigation is required	CEQA: No impact
		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
	AQ-2: Alternative 2 construction would not result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-7.	CEQA: No impact	CEQA: No mitigation is required	CEQA: No impact
		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
	AQ-3: Alternative 2 would result in operational emissions that exceed an SCAQMD threshold of significance in Table 3.2-8.	CEQA: Operations would be significant for NO_X in 2019~~, 2033, and 2038~~ and CO and VOC in 2033 and 2038.	CEQA: Mitigation is not applicable	CEQA: Operations would be significant and unavoidable for NO_X in 2019~~, 2033, and 2038~~ and CO and VOC in 2033 and 2038.
		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
	AQ-4: Alternative 2 operations would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-9.	CEQA: Operations would be significant for PM_{10} (24-hour and annual averages).	CEQA: Mitigation is not applicable	CEQA: Operations would be significant and unavoidable for PM_{10} (24-hour and annual averages).
		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
	AQ-5: Alternative 2 would not generate on-road traffic that would contribute to an exceedance of the 1-hour or 8-hour CO standards.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
	AQ-6: Alternative 2 would not create an objectionable odor at the nearest sensitive receptor.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
	AQ-7: Alternative 2 would not expose receptors to significant levels of TACs.	CEQA: Less than significant	CEQA: Mitigation is not applicable	CEQA: Less than significant
		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
	AQ-8: Alternative 2 would not conflict with or obstruct implementation of an applicable AQMP.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant

		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
Alternative 3 – Reduced Project: Reduced Wharf Improvements	**AQ-1:** Alternative 3 would result in construction-related emissions that exceed an SCAQMD threshold of significance in Table 3.2-6.	CEQA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for NO_X in 2019.	**MM AQ-1 through MM AQ-5**	CEQA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X in 2019.
		NEPA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for NO_X and VOC in 2019.		NEPA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X and VOC in 2019.
	AQ-2: Alternative 3 construction would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-7.	CEQA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for PM_{10} (24-hour and annual average).	**MM AQ-1 through MM AQ-5**	CEQA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for PM_{10} (24-hour and annual average).
		NEPA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for NO_2 (federal 1-hour average).		NEPA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for NO_2 (federal 1-hour average).
	AQ-3: Alternative 3 would result in operational emissions that exceed an SCAQMD threshold of significance in Table 3.2-8.	CEQA: Operations would be significant for ~~NO_x,~~ CO and VOC in 2033 and 2038.	**MM AQ-6, MM AQ-7, LM AQ-1, and LM AQ-2**	CEQA: Operations would be significant and unavoidable for CO and VOC in 2033 and 2038.

		NEPA: Operations would be significant for NO_X in 2019, 2026, 2033, and 2038; $PM_{2.5}$, CO, and VOC in 2033 and 2038.		NEPA: Operations would be significant and unavoidable for NO_X in 2026, 2033, and 2038 and CO in 2033 and 2038.
	AQ-4: Alternative 3 operations would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-9.	CEQA: Operations would be significant for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).	**MM AQ-6 and MM AQ-7**	CEQA: Operations would be significant and unavoidable for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).
		NEPA: Operations would be significant for PM_{10} (24-hour and annual averages).		NEPA: Operations would be significant and unavoidable for PM_{10} (24-hour and annual averages).
	AQ-5: Alternative 3 would not generate on-road traffic that would contribute to an exceedance of the 1-hour or 8-hour CO standards.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant		NEPA: Less than significant
	AQ-6: Alternative 3 would not create an objectionable odor at the nearest sensitive receptor.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant		NEPA: Less than significant
	AQ-7: Alternative 3 would expose receptors to significant levels of TACs.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: Construction and operation would be significant for individual cancer risk.	**MM AQ-1 through MM AQ-5, LM AQ-1, and LM AQ-2**	NEPA: Less than significant
	AQ-8: Alternative 3 would not conflict with or obstruct implementation of an applicable AQMP.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant.
		NEPA: Less than significant		NEPA: Less than significant
Alternative 4 – Reduced Project: No Backland Improvements	**AQ-1:** Alternative 4 would result in construction-related emissions that exceed an SCAQMD threshold of significance in Table 3.2-6.	CEQA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for NO_X in 2019.	**MM AQ-1 through MM AQ-5**	CEQA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X in 2019.

		NEPA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for NO_X and VOC in 2019.		NEPA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X in 2019.
	AQ-2: Alternative 4 construction would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-7.	CEQA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for PM_{10} (annual average).	**MM AQ-1 through MM AQ-5**	CEQA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for PM_{10} (annual average).
		NEPA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for NO_2 (federal 1-hour average).		NEPA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for NO_2 (federal 1-hour average).
	AQ-3: Alternative 4 would result in operational emissions that exceed an SCAQMD threshold of significance in Table 3.2-8.	CEQA: Operations would be significant for ~~NO_X and~~ CO in 2033 and 2038.	**MM AQ-6, MM AQ-7, LM AQ-1, and LM AQ-2**	CEQA: Operations would be significant and unavoidable for CO in 2033 and 2038.
		NEPA: Operations would be significant for NO_X in 2019, 2026, 2033, and 2038.		NEPA: Operations would be significant and unavoidable for NO_X in 2026, 2033, and 2038.
	AQ-4: Alternative 4 operations would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-9.	CEQA: Operations would be significant for PM_{10} (24-hour and annual averages).	**MM AQ-6 and MM AQ-7**	CEQA: Operations would be significant and unavoidable for PM_{10} (24-hour and annual averages).

		NEPA: Operations would be significant for NO_2 (federal 1-hour and state annual average) and PM_{10} (24-hour and annual averages).		NEPA: Operations would be significant and unavoidable for NO_2 (federal 1-hour and state annual average) and PM_{10} (24-hour and annual averages).
	AQ-5: Alternative 4 would not generate on-road traffic that would contribute to an exceedance of the 1-hour or 8-hour CO standards.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant		NEPA: Less than significant
	AQ-6: Alternative 4 would not create an objectionable odor at the nearest sensitive receptor.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant		NEPA: Less than significant
	AQ-7: Alternative 4 would not expose receptors to significant levels of TACs.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant		NEPA: Less than significant
	AQ-8: Alternative 4 would not conflict with or obstruct implementation of an applicable AQMP.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant.
		NEPA: Less than significant		NEPA: Less than significant
Alternative 5 – Expanded On-Dock Rail Yard: Wharf and Backland Improvements with an Expanded TICTF	**AQ-1:** Alternative 5 would result in construction-related emissions that exceed an SCAQMD threshold of significance in Table 3.2-6.	CEQA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for NO_X in 2019.	**MM AQ-1 through MM AQ-5**	CEQA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X in 2019.
		NEPA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for $PM_{2.5}$, NO_X, and VOC in 2019.		NEPA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X and VOC in 2019.

	AQ-2: Alternative 5 construction would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-7.	CEQA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal and state 1-hour average). Overlapping construction and operations would be significant for PM_{10} (24-hour and annual average).	**MM AQ-1 through MM AQ-5**	CEQA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for PM_{10} (24-hour and annual average).
		NEPA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for NO_2 (federal 1-hour average).		NEPA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for NO_2 (federal 1-hour average).
	AQ-3: Alternative 5 would result in operational emissions that exceed an SCAQMD threshold of significance in Table 3.2-8.	CEQA: Operations would be significant for NO_X in 2019~~,~~ ~~2033, and 2038~~ and CO and VOC in 2033 and 2038.	**MM AQ-6, MM AQ-7, LM AQ-1, and LM AQ-2**	CEQA: Operations would be significant and unavoidable for CO and VOC in 2033 and 2038.
		NEPA: Operations would be significant for NO_X in 2019, 2026, 2033, and 2038; VOC in 2026, 2033, and 2038; and $PM_{2.5}$ and CO in 2033 and 2038.		NEPA: Operations would be significant and unavoidable for NO_X in 2026, 2033, 2038 and CO and VOC in 2033 and 2038.
	AQ-4: Alternative 5 operations would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-9.	CEQA: Operations would be significant for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).	**MM AQ-6 and MM AQ-7**	CEQA: Operations would be significant and unavoidable for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).
		NEPA: Operations would be significant for PM_{10} (24-hour and annual averages).		NEPA: Operations would be significant and unavoidable for PM_{10} (24-hour and annual averages).
	AQ-5: Alternative 5 would not generate on-road traffic that	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant

	would contribute to an exceedance of the 1-hour or 8-hour CO standards.	NEPA: Less than significant		NEPA: Less than significant
	AQ-6: Alternative 5 would not create an objectionable odor at the nearest sensitive receptor.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant		NEPA: Less than significant
	AQ-7: Alternative 5 would expose receptors to significant levels of TACs.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant
		NEPA: Construction and operation would be significant for individual cancer risk and population cancer burden.	**MM AQ-1 through MM AQ-7, LM AQ-1, and LM AQ-2**	NEPA: Less than significant
	AQ-8: Alternative 5 would not conflict with or obstruct implementation of an applicable AQMP.	CEQA: Less than significant	No mitigation is required	CEQA: Less than significant.
		NEPA: Less than significant		NEPA: Less than significant

1

Section ES.5.2.4, Pages ES-58 to ES-59

Revise mitigation measures MM AQ-2, MM AQ-3, MM AQ-5, and MM AQ-7 as follows:

MM AQ-2: On-road Trucks Used during Construction. On-road trucks shall comply with EPA 2010 on-road emission standards or better, unless the contractor ~~can reasonably demonstrate~~ provides a written finding consistent with project contract or lease management requirements and obtains written approval from the Lead Agency that such equipment is unavailable ~~to the satisfaction of LAHD~~.

MM AQ-3: Non-Road Construction Equipment (except vessels, harbor craft, on-road trucks, and dredging equipment). All non-road construction equipment greater than 50 hp must meet EPA Tier 4 emission standards, unless the contractor ~~can reasonably demonstrate~~ provides a written finding consistent with project contract or lease management requirements and obtains written approval from the Lead Agency that such equipment is unavailable ~~to the satisfaction of LAHD~~.

MM AQ-5: General Construction Mitigation Measure. All dredging equipment must be electric; however, this is subject to availability of the equipment. For MM AQ-1 through MM AQ-4, if a CARB-certified technology becomes available that is as good as or better than the existing measure in terms of emissions performance, the technology could replace the existing technology if approved by LAHD.

MM AQ-7: Alternative Maritime Power (AMP). By 2020 or upon substantial completion of construction, ~~85~~90 percent of Evergreen ships calling at the Everport Terminal must use AMP. By 2026, 95 percent of all ship calls at the Everport Container Terminal must use AMP or approved equivalent under the CARB Shore-Power Regulation. The equivalent alternative technology must, at a minimum, meet the emissions reductions that would be achieved from AMP.

Section ES.5.2.4, Page ES-59

Revise the footnote for mitigation measure MM BIO-1, as follows:

MM BIO-1: Protect Marine Mammals. Although it is expected that marine mammals will voluntarily move away from the area at the commencement of the vibratory or "soft start" of pile driving activities, as a precautionary measure, pile driving activities occurring as part of the sheet pile and king pile installation will include establishment of level B (harassment) and level A (injury) safety zones by a qualified marine mammal professional, and the area surrounding the operations (including the safety zones) will be monitored for marine mammals by a qualified marine mammal observer.[~~2~~1]

The pile driving site will move with each new pile; therefore, the safety zones will move accordingly.

[~~2~~1]Marine mammal professional qualifications shall be identified based on criteria established by LAHD during the construction bid specification process. Upon selection as part of the construction award winning team, the qualified marine mammal professional shall develop site specific pile driving safety zone requirements, which shall follow NOAA Fisheries Technical Guidance Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (NOAA Fisheries 2016) in consultation with the Acoustic Threshold White Paper prepared for this purpose by LAHD (LAHD 2017). Final pile driving safety zone requirements developed by the selected marine mammal professional shall be submitted to LAHD Construction and Environmental Management Divisions ~~prior to commencement of pile driving~~.

Section ES.5.2.4, Page ES-60

Revise mitigation measure MM NOI-2, as follows:

MM NOI-2: Utilize Temporary Noise Attenuation Curtain Adjacent to Pile Driving Equipment. If under MM NOI-1 the reduced pile driving noise exceeds 103 dBA at 50 feet from the pile driver, u~~U~~tilize temporary noise attenuation curtain suitable for pile driving equipment as needed. This noise attenuation device should be installed directly between the equipment and the nearest noise sensitive receptor to the construction site.

Section ES.5.2.5, Page ES-61

Revise lease measure LM GHG-1, as follows:

LM GHG-1: GHG Credit Fund. Proposed Project GHG emissions are ~~278,708~~99,812 metric tons of CO2e above the CEQA Baseline in the peak year of operations in 2038. They exceed the 10,000 metric ton CO2e significance threshold by ~~268,708~~99,856 metric tons. Because operational GHG emissions exceed the significance threshold with the incorporation of all feasible mitigation measures, LAHD shall establish a carbon offset fund, which may be accomplished through a Memorandum of Understanding with the California Air Resources Board or another appropriate entity, to mitigate project GHG impacts to the maximum extent feasible. The fund shall be used for GHG-reducing projects and programs on Port of Los Angeles property. It shall be the responsibility of the Tenant to contribute to the fund. Fund contribution shall be the equivalent of 1 percent of the minimum annual guarantee (MAG) at the time that project construction will commence. This amount will be approximately $300,000~~$250,000~~, payable upon substantial completion of Project construction. This amount is appropriate because it takes into account the tenant's actual container throughput and assesses a fee in correlation with the facility's GHG ~~$250,000 has been identified as the maximum feasible~~ contribution level~~. taking into account the cost of the proposed Project, including on-site GHG-reducing mitigation measures that the tenant will be required to implement (LED high mast lighting and solar panels over the employee parking lot).~~ If LAHD is unable to establish the fund within a reasonable period of time, the Tenant shall instead purchase credits from an approved GHG offset registry in the amount of approximately $300,000~~$250,000~~.

Section ES.5.2.6, Page ES-64

Revise the first bullet under "Air Quality", as follows

Air Quality

- Although Alternative 2 does not include construction, operational emissions would exceed SCAQMD significance thresholds for NO_X in 2019~~, 2033, and 2038~~; and for CO and VOC in 2033 and 2038 under CEQA. Operational emissions from Alternative 2 would also result in the exceedance of ambient threshold PM_{10}. These impacts would combine with impacts from concurrent related projects, which would already be cumulatively significant. As a result, after mitigation, Alternative 2 would make a cumulatively considerable and unavoidable contribution to a significant cumulative impact for NO_X, CO, VOC and PM_{10} under CEQA.

Section ES.5.2.6, Pages ES-64 to ES-65

Add the following between the second bullet and third bullet under "Air Quality", as follows:

- Alternative 3 would make a cumulatively considerable and unavoidable contribution to a significant cumulative impact for CO and VOC emissions in 2033 and 2038 under CEQA, and for NO_X in 2026, 2033, and 2038 and CO in 2033 and 2038 under NEPA.

3.2.2 Changes Made to Section 3.2, Air Quality and Meteorology

Section 3.2.4.5, Pages 3.2-32 to 3.2-33

Revise mitigation measures MM AQ-2, MM AQ-3, and MM AQ-5, as follows:

MM AQ-2: **On-road Trucks Used during Construction.** On-road trucks shall comply with EPA 2010 on-road emission standards or better, unless the contractor ~~can reasonably demonstrate~~ provides a written finding consistent with project contract or lease management requirements and obtains written approval from the Lead Agency that such equipment is unavailable ~~to the satisfaction of LAHD~~.

MM AQ-3: **Non-Road Construction Equipment** (except vessels, harbor craft, on-road trucks, and dredging equipment). All non-road construction equipment greater than 50 hp must meet EPA Tier 4 emission standards, unless contractor ~~can reasonably demonstrate~~ provides a written finding consistent with project contract or lease management requirements and obtains written approval from the Lead Agency that such equipment is unavailable ~~to the satisfaction of LAHD~~.

MM AQ-5: **General Construction Mitigation Measure.** All dredging equipment must be electric; however, this is subject to availability of the equipment. For MM AQ-1 through MM AQ-4, if a CARB-certified technology becomes available that is as good as or better than the existing measure in terms of emissions performance, the technology could replace the existing technology if approved by LAHD.

Section 3.2.4.5, Pages 3.2-46 to 3.2-49, Table 3.2-20

Revise Table 3.2-20, as follows:

Table 3.2-20: Peak Daily Operational Emissions — Proposed Project (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
Year 2019												
Ships: Main Propulsion Engines	127	119	7,113	146	834	480	111	105	6,068	118	779	460
Ships: Aux Engines and Boilers	42	40	1,695	101	154	61	35	33	1,345	90	123	49
AMP Electricity Use	1	1	10	4	5	0	2	2	17	7	8	0
Tugboats	2	2	63	0	134	10	2	2	63	0	134	10
Trucks	164	53	2,664	5	235	73	164	53	2,664	5	235	73
Line Haul Locomotives	27	25	1,099	1	284	44	27	25	1,099	1	284	44
Switch Locomotives	0	0	16	0	5	1	0	0	16	0	5	1
Cargo Handling Equipment	4	3	306	2	393	34	4	3	306	2	393	34
Worker Vehicles	17	5	8	0	88	3	17	5	8	0	88	3
Total Operational Year 2019	**383**	**247**	**12,976**	**260**	**2,131**	**706**	**361**	**227**	**11,586**	**224**	**2,049**	**675**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	-81	-56	217	-822	163	-59	-102	-76	-1,172	-859	80	-91
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	**Yes**	No	No	No	No	No	No	No	No	No
NEPA Impacts												
NEPA Baseline Emissions	367	234	11,841	244	2,006	687	367	234	11,841	244	2,006	687
Project Minus NEPA Baseline	16	13	1,135	17	126	19	-6	-7	-254	-20	43	-12
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	**Yes**	No	No	No	No	No	No	No	No	No
Year 2026												
Ships: Main Propulsion Engines	132	124	~~7,148~~ 6,293	150	876	506	117	110	5,576	122	822	487
Ships: Aux Engines and Boilers	50	47	1,942	117	185	73	43	41	1,487	107	154	61
AMP Electricity Use	2	2	23	10	11	1	3	3	29	12	14	1
Tugboats	2	1	60	0	143	10	2	1	60	0	143	10
Trucks	191	54	1,231	6	198	42	191	54	1,231	6	198	42
Line Haul Locomotives	26	24	1,191	2	459	45	26	24	1,191	2	459	45
Switch Locomotives	0	0	18	0	7	1	0	0	18	0	7	1
Cargo Handling Equipment	5	4	158	3	552	38	5	4	158	3	552	38
Worker Vehicles	20	6	5	0	68	3	20	6	5	0	68	3
Total Operational Year 2026	**427**	**263**	**~~11,777~~**	**288**	**2,500**	**719**	**406**	**243**	**9,756**	**252**	**2,418**	**688**

Table 3.2-20: Peak Daily Operational Emissions — Proposed Project (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
			10,922									
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	-36	-40	~~-982~~ -1,837	-794	531	-46	-58	-60	-3,002	-831	449	-77
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	No	No	No	No	No	No	No	No	No	No
NEPA Impacts												
NEPA Baseline Emissions	344	215	8,523	236	2,058	641	344	215	8,523	236	2,058	641
Project Minus NEPA Baseline	83	48	~~3,255~~ 2,400	53	442	79	62	28	1,234	16	360	48
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	**Yes**	No	No	**Yes**	No	No	**Yes**	No	No	No
Year 2033												
Ships: Main Propulsion Engines	190	178	~~10,544~~ 5,862	226	1,216	692	156	146	4,915	162	1,095	649
Ships: Aux Engines and Boilers	46	43	1,854	102	176	69	43	41	1,093	100	162	64
AMP Electricity Use	1	1	12	5	6	0	2	2	17	7	8	0
Tugboats	2	2	85	0	204	15	2	2	85	0	204	15
Trucks	209	58	1,030	6	224	40	209	58	1,030	6	224	40
Line Haul Locomotives	58	53	3,125	8	1,935	115	58	53	3,125	8	1,935	115
Switch Locomotives	1	1	41	0	16	2	1	1	41	0	16	2
Cargo Handling Equipment	6	5	172	4	713	48	6	5	172	4	713	48
Worker Vehicles	24	7	4	0	64	3	24	7	4	0	64	3
Total Operational Year 2033	**537**	**349**	**~~16,869~~ 12,187**	**351**	**4,554**	**985**	**500**	**315**	**10,483**	**288**	**4,421**	**936**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	73	46	~~4,110~~ -572	-731	2,585	220	37	12	-2,276	-795	2,452	171
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	~~**Yes**~~ No	No	**Yes**	**Yes**	No	No	No	No	**Yes**	**Yes**

Table 3.2-20: Peak Daily Operational Emissions — Proposed Project (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
NEPA Impacts												
NEPA Baseline Emissions	405	270	7,729	279	3,437	852	405	270	7,729	279	3,437	852
Project Minus NEPA Baseline	132	79	~~9,140~~ 4,458	72	1,117	133	96	45	2,753	9	984	85
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	**Yes**	**Yes**	No	**Yes**	**Yes**	No	No	**Yes**	No	**Yes**	**Yes**
Year 2038												
Ships: Main Propulsion Engines	190	178	~~10,544~~ 3,541	226	1,216	692	156	146	3,042	162	1,095	649
Ships: Aux Engines and Boilers	46	43	1,854	102	176	69	43	41	745	100	162	64
AMP Electricity Use	1	1	12	5	6	0	2	2	17	7	8	0
Tugboats	2	2	77	0	176	13	2	2	77	0	176	13
Trucks	209	58	929	6	216	37	209	58	929	6	216	37
Line Haul Locomotives	36	33	2,253	8	1,935	84	36	33	2,253	8	1,935	84
Switch Locomotives	0	0	23	0	16	1	0	0	23	0	16	1
Cargo Handling Equipment	6	5	166	4	713	48	6	5	166	4	713	48
Worker Vehicles	24	7	4	0	56	3	24	7	4	0	56	3
Total Operational Year 2038	**514**	**328**	**~~15,862~~ 8,859**	**351**	**4,511**	**948**	**477**	**294**	**7,255**	**288**	**4,377**	**899**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	50	25	~~3,103~~ -3,900	-732	2,542	183	14	-9	-5,504	-795	2,409	134
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	~~**Yes**~~ No	No	**Yes**	**Yes**	No	No	No	No	**Yes**	**Yes**
NEPA Impacts												
NEPA Baseline Emissions	390	257	4,524	279	3,397	827	390	257	4,524	279	3,397	827
Project Minus NEPA Baseline	124	71	~~11,338~~ 4,335	72	1,114	121	87	37	2,731	9	980	72
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	**Yes**	**Yes**	No	**Yes**	**Yes**	No	No	**Yes**	No	**Yes**	**Yes**

Table 3.2-20: Peak Daily Operational Emissions — Proposed Project (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**

Notes:

Emissions assume the simultaneous occurrence of peak daily equipment activity levels. Such levels would rarely occur during day-to-day terminal operations.

Truck, train, ship, and worker commute emissions include transport within the South Coast Air Basin.

AMP electricity use reflects indirect emissions from regional power generation.

NEPA baseline emissions reflect the NEPA baseline operational, presented in Table 3.2-5.

Emissions might not precisely add due to rounding.

The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

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Section 3.2.4.5, Page 3.2-50

Revise CEQA Impact Determination first paragraph, as follows:

Table 3.2-20 shows that unmitigated peak daily operational emissions would exceed the SCAQMD daily emission thresholds and would be significant for NO_X in 2019 and ~~NO_X,~~ CO~~,~~ and VOC under CEQA in years 2033 and 2038.

Section 3.2.4.5, Page 3.2-51

Revise mitigation measures MM AQ-7, as follows:

MM AQ-7: **Alternative Maritime Power (AMP).** By 2020 or upon substantial completion of construction, ~~85~~90 percent of Evergreen ships calling at the Everport Terminal must use AMP. By 2026, 95 percent of all ship calls at the Everport Container Terminal must use AMP or approved equivalent under the CARB Shore-Power Regulation. The equivalent alternative technology must, at a minimum, meet the emissions reductions that would be achieved from AMP.

Section 3.2.4.5, Page 3.2-52

Revise Residual Impacts first paragraph, as follows:

Table 3.2-20 shows that emissions from operation of the proposed Project would be reduced with mitigation. Emissions of NO_X in 2019~~, 2033 and 2038~~ would be reduced to levels that are less than significant under CEQA. However, CO and VOC emissions in 2033 and 2038 would remain significant and unavoidable under CEQA.

Section 3.2.4.5, Page 3.2-54, Table 3.2-21

Revise MM AQ-7 in Table 3.2-21, as follows:

Table 3.2-21: Comparison between San Pedro Bay Ports 2010 CAAP Update Control Measures and Proposed Project Mitigation Measures

CAAP Measure #	CAAP Measure Name	CAAP Measure Description	EIS/EIR Mitigation Measure (MM)	Discussion
SPBP-OGV2	Reduction of At-Berth OGV Emissions	The use of shore power to reduce hoteling emissions implemented at all container and cruise terminals and one liquid bulk terminal at the Port of Los Angeles	**MM AQ-7:** By 2019, ~~85~~90 percent of Evergreen ships calling at the Everport Terminal must use AMP. By 2026, 95 percent of all ship calls at the Everport Container Terminal must use AMP or approved equivalent under the CARB Shore-Power Regulation. The equivalent alternative technology must, at a minimum, meet the emissions reductions that would be achieved from AMP.	**MM AQ-7** complies with CAAP OGV2. OGV2 is preempted by CARB regulation.

1

Section 3.2.4.5, Pages 3.2-95 to 3.2-97, Table 3.2-35

Revise Table 3.2-35, as follows:

Table 3.2-35: Peak Daily Operational Emissions—Alternative 1 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
Year 2019												
Ships: Main Propulsion Engines	131	123	7,359	151	859	494	113	106	6,121	118	794	471
Ships: Aux Engines and Boilers	43	41	1,689	108	154	61	44	41	1,687	110	154	61
AMP Electricity Use	2	2	17	7	8	0	2	2	18	8	9	0
Tugboats	2	2	63	0	134	10	2	2	63	0	134	10
Trucks	162	52	2,646	5	234	73	162	52	2,646	5	234	73
Line Haul Locomotives	25	23	1,046	1	270	42	25	23	1,046	1	270	42
Switch Locomotives	0	0	16	0	5	1	0	0	16	0	5	1
Cargo Handling Equipment	3	3	236	2	318	26	3	3	236	2	318	26
Worker Vehicles	17	5	8	0	87	3	17	5	8	0	87	3
Total Operational Year 2019	**385**	**250**	**13,079**	**275**	**2,070**	**710**	**367**	**234**	**11,841**	**244**	**2,006**	**687**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Alternative Minus CEQA Baseline	-79	-53	321	-808	101	-56	-97	-69	-918	-839	37	-79
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	**Yes**	No	No	No	No	No	No	No	No	No
Year 2026												
Ships: Main Propulsion Engines	134	126	~~7,508~~ 6,326	154	876	504	115	108	5,262	120	811	481
Ships: Aux Engines and Boilers	47	44	1,896	112	173	68	39	37	1,300	100	138	55
AMP Electricity Use	1	1	10	4	5	0	2	2	17	7	8	0
Tugboats	2	1	60	0	143	10	2	1	60	0	143	10
Trucks	148	42	959	4	154	32	148	42	959	4	154	32
Line Haul Locomotives	17	16	785	1	303	30	17	16	785	1	303	30
Switch Locomotives	0	0	14	0	6	1	0	0	14	0	6	1
Cargo Handling Equipment	4	3	121	3	437	29	4	3	121	3	437	29
Worker Vehicles	17	5	5	0	58	2	17	5	5	0	58	2
Total Operational Year 2026	**370**	**239**	**~~11,357~~ 10,175**	**279**	**2,154**	**677**	**344**	**215**	**8,523**	**236**	**2,058**	**641**

Table 3.2-35: Peak Daily Operational Emissions—Alternative 1 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Alternative Minus CEQA Baseline	-94	-64	~~-1,402~~ -2,584	-803	185	-88	-119	-88	-4,236	-847	89	-125
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	No	No	No	No	No	No	No	No	No	No
Year 2033												
Ships: Main Propulsion Engines	189	178	~~10,812~~ 5,139	228	1,206	684	153	144	3,938	159	1,076	638
Ships: Aux Engines and Boilers	53	50	2,226	119	202	79	41	38	843	100	147	58
AMP Electricity Use	0	0	4	2	2	0	2	2	16	7	8	0
Tugboats	2	2	85	0	204	15	2	2	85	0	204	15
Trucks	146	41	718	4	157	28	146	41	718	4	157	28
Line Haul Locomotives	37	34	1,964	5	1,216	72	37	34	1,964	5	1,216	72
Switch Locomotives	0	0	27	0	12	2	0	0	27	0	12	2
Cargo Handling Equipment	5	4	133	3	563	36	5	4	133	3	563	36
Worker Vehicles	20	6	4	0	54	2	20	6	4	0	54	2
Total Operational Year 2033	**452**	**315**	**~~15,975~~ 10,302**	**362**	**3,617**	**919**	**405**	**270**	**7,729**	**279**	**3,437**	**852**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Alternative Minus CEQA Baseline	-11	12	~~3,216~~ -2,457	-721	1,649	154	-59	-33	-5,029	-804	1,468	86
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	~~**Yes**~~ **No**	No	**Yes**	**Yes**	No	No	No	No	**Yes**	**Yes**
Year 2038												
Ships: Main Propulsion Engines	189	178	~~10,812~~ 2,302	228	1,206	684	153	144	1,765	159	1,076	638
Ships: Aux Engines and Boilers	53	50	2,226	119	202	79	41	38	459	100	147	58
AMP Electricity Use	0	0	4	2	2	0	2	2	16	7	8	0
Tugboats	2	2	77	0	176	13	2	2	77	0	176	13
Trucks	145	40	646	4	152	26	145	40	646	4	152	26
Line Haul Locomotives	23	21	1,416	5	1,216	53	23	21	1,416	5	1,216	53

Table 3.2-35: Peak Daily Operational Emissions—Alternative 1 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
Switch Locomotives	0	0	13	0	12	1	0	0	13	0	12	1
Cargo Handling Equipment	5	4	129	3	563	36	5	4	129	3	563	36
Worker Vehicles	20	6	3	0	47	2	20	6	3	0	47	2
Total Operational Year 2038	**438**	**302**	~~**15,327**~~ **6,817**	**362**	**3,577**	**895**	**390**	**257**	**4,524**	**279**	**3,397**	**827**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Alternative Minus CEQA Baseline	-26	-1	~~2,569~~ -5,941	-721	1,609	129	-74	-46	-8,234	-804	1,429	62
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	~~**Yes**~~ No	No	**Yes**	**Yes**	No	No	No	No	**Yes**	**Yes**

Notes:

Emissions assume the simultaneous occurrence of peak daily equipment activity levels. Such levels would rarely occur during day-to-day terminal operations.

Truck, train, ship, and worker commute emissions include transport within the South Coast Air Basin.

AMP electricity use reflects indirect emissions from regional power generation.

NEPA does not require analysis of the No Project Alternative.

Emissions might not precisely add due to rounding.

The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

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Section 3.2.4.5, Page 3.2-98

Revise CEQA Impact Determination first paragraph, as follows:

Table 3.2-35 shows that peak daily operational emissions would exceed the SCAQMD daily emission thresholds and would be significant under CEQA for NO_X in 2019~~, 2033, and 2038~~ and CO and VOC in 2033 and 2038. Therefore, emissions of NO_X, CO, and VOC associated with the operation of Alternative 1 would be significant under CEQA before mitigation.

Section 3.2.4.5, Page 3.2-98

Revise Residual Impacts first paragraph, as follows:

> Table 3.2-35 shows that emissions from operation of Alternative 1 would be reduced with mitigation. Emissions for NO_X in 2019~~, 2033, and 2038~~ would be reduced to levels that are less than significant under CEQA. However, CO and VOC emissions in 2033 and 2038 would remain significant and unavoidable under CEQA.

Section 3.2.4.5, Page 3.2-110

Revise CEQA Impact Determination first paragraph, as follows:

Table 3.2-35, presented under Alternative 1, shows that peak daily operational emissions from Alternative 2 would exceed the SCAQMD daily emission thresholds and would be significant under CEQA for NO_X in 2019~~, 2033, and 2038~~ and CO and VOC in 2033 and 2038. Therefore, emissions of NO_X, CO, and VOC associated with the operation of Alternative 2 would be significant under CEQA.

Section 3.2.4.5, Pages 3.2-141 to 3.2-143, Table 3.2-52

Revise Table 3.2-52, as follows:

Table 3.2-52: Peak Daily Operational Emissions — Alternative 3 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
Year 2019												
Ships: Main Propulsion Engines	124	117	6,978	142	823	475	109	103	5,932	114	769	455
Ships: Aux Engines and Boilers	30	28	1,220	68	111	44	27	26	1,102	66	100	40
AMP Electricity Use	1	1	5	2	3	0	1	1	8	4	4	0
Tugboats	2	2	63	0	134	10	2	2	63	0	134	10
Trucks	159	51	2,592	5	229	71	159	51	2,592	5	229	71
Line Haul Locomotives	23	22	966	1	250	39	23	22	966	1	250	39
Switch Locomotives	0	0	16	0	5	1	0	0	16	0	5	1
Cargo Handling Equipment	4	3	286	2	371	32	4	3	286	2	371	32
Worker Vehicles	17	5	8	0	86	3	17	5	8	0	86	3
Total Operational Year 2019	**360**	**228**	**12,134**	**221**	**2,011**	**674**	**342**	**212**	**10,974**	**192**	**1,947**	**650**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	-104	-75	-625	-861	42	-91	-121	-91	-1,785	-891	-21	-115
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	No	No	No	No	No	No	No	No	No	No
NEPA Impacts												
NEPA Baseline Emissions	367	234	11,841	244	2,006	687	367	234	11,841	244	2,006	687
Project Minus NEPA Baseline	-7	-6	293	-22	5	-13	-24	-22	-867	-52	-59	-36
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	**Yes**	No	No	No	No	No	No	No	No	No
Year 2026												
Ships: Main Propulsion Engines	129	121	~~6,968~~ 5,782	147	853	493	113	107	5,065	118	799	474
Ships: Aux Engines and Boilers	44	42	1,691	107	162	64	40	38	1,289	100	142	57
AMP Electricity Use	3	3	26	11	13	1	3	3	31	13	15	1
Tugboats	2	1	60	0	143	10	2	1	60	0	143	10
Trucks	181	51	1,168	5	188	40	181	51	1,168	5	188	40
Line Haul Locomotives	24	22	1,104	2	426	42	24	22	1,104	2	426	42
Switch Locomotives	0	0	17	0	7	1	0	0	17	0	7	1
Cargo Handling Equipment	4	4	147	3	519	36	4	4	147	3	519	36
Worker Vehicles	20	6	5	0	66	3	20	6	5	0	66	3
Total Operational Year 2026	**406**	**250**	**~~11,186~~**	**275**	**2,377**	**689**	**387**	**232**	**8,887**	**242**	**2,304**	**662**

Table 3.2-52: Peak Daily Operational Emissions — Alternative 3 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
			10,000									
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	-57	-53	~~-1,573~~ -2,759	-808	408	-76	-76	-71	-3,872	-840	336	-104
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	No	No	No	No	No	No	No	No	No	No
NEPA Impacts												
NEPA Baseline Emissions	344	215	8,523	236	2,058	641	344	215	8,523	236	2,058	641
Project Minus NEPA Baseline	62	35	~~2,664~~ 1,478	39	319	48	43	17	364	7	247	21
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	**Yes**	No	No	No	No	No	**Yes**	No	No	No
Year 2033												
Ships: Main Propulsion Engines	187	176	~~10,432~~ 5,330	225	1,195	679	153	144	4,382	161	1,074	635
Ships: Aux Engines and Boilers	47	44	1,926	105	182	71	42	39	975	98	155	61
AMP Electricity Use	1	1	9	4	5	0	2	2	16	7	8	0
Tugboats	2	2	85	0	204	15	2	2	85	0	204	15
Trucks	194	54	957	5	208	37	194	54	957	5	208	37
Line Haul Locomotives	53	49	2,836	7	1,756	104	53	49	2,836	7	1,756	104
Switch Locomotives	1	1	38	0	15	2	1	1	38	0	15	2
Cargo Handling Equipment	6	5	161	4	670	45	6	5	161	4	670	45
Worker Vehicles	23	7	4	0	62	3	23	7	4	0	62	3
Total Operational Year 2033	**514**	**339**	**~~16,448~~ 11,346**	**350**	**4,298**	**957**	**475**	**302**	**9,455**	**282**	**4,153**	**903**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	51	36	~~3,689~~ -1,413	-733	2,330	191	12	-1	-3,303	-800	2,184	138
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	~~**Yes**~~ No	No	**Yes**	**Yes**	No	No	No	No	**Yes**	**Yes**

Table 3.2-52: Peak Daily Operational Emissions — Alternative 3 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
NEPA Impacts												
NEPA Baseline Emissions	405	270	7,729	279	3,437	852	405	270	7,729	279	3,437	852
Project Minus NEPA Baseline	109	68	~~8,719~~ 3,617	71	861	105	70	32	1,726	3	716	52
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	**Yes**	**Yes**	No	**Yes**	**Yes**	No	No	**Yes**	No	**Yes**	No
Year 2038												
Ships: Main Propulsion Engines	187	176	~~10,432~~ 3,038	225	1,195	679	153	144	2,539	161	1,074	635
Ships: Aux Engines and Boilers	47	44	1,926	105	182	71	42	39	648	98	155	61
AMP Electricity Use	1	1	9	4	5	0	2	2	16	7	8	0
Tugboats	2	2	77	0	176	13	2	2	77	0	176	13
Trucks	194	54	862	5	201	35	194	54	862	5	201	35
Line Haul Locomotives	33	30	2,045	7	1,756	76	33	30	2,045	7	1,756	76
Switch Locomotives	0	0	20	0	15	1	0	0	20	0	15	1
Cargo Handling Equipment	6	5	155	4	670	44	6	5	155	4	670	44
Worker Vehicles	23	7	4	0	54	2	23	7	4	0	54	2
Total Operational Year 2038	**493**	**319**	**~~15,530~~ 8,136**	**350**	**4,256**	**923**	**454**	**283**	**6,367**	**282**	**4,110**	**869**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	30	16	**~~2,772~~ -4,622**	-733	2,287	158	-9	-20	-6,392	-800	2,142	104
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	**~~Yes~~** No	No	**Yes**	**Yes**	No	No	No	No	**Yes**	**Yes**
NEPA Impacts												
NEPA Baseline Emissions	390	257	4,524	279	3,397	827	390	257	4,524	279	3,397	827
Project Minus NEPA Baseline	103	62	~~11,006~~ 3,612	71	859	96	64	26	1,843	3	713	42
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	**Yes**	**Yes**	No	**Yes**	**Yes**	No	No	**Yes**	No	**Yes**	No

Notes:

Emissions assume the simultaneous occurrence of peak daily equipment activity levels. Such levels would rarely occur during day-to-day terminal operations.

Table 3.2-52: Peak Daily Operational Emissions — Alternative 3 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**

Truck, train, ship, and worker commute emissions include transport within the South Coast Air Basin.

AMP electricity use reflects indirect emissions from regional power generation.

Emissions might not precisely add due to rounding.

The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

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Section 3.2.4.5, Page 3.2-144

Revise CEQA Impact Determination first paragraph, as follows:

Table 3.2-52 shows that peak daily operational emissions would exceed the SCAQMD daily emission thresholds and would be significant under CEQA for ~~NO_x,~~ ~~CO,~~ and VOC in 2033 and 2038.

Section 3.2.4.5, Page 3.2-144

Revise Residual Impacts first paragraph, as follows:

> Table 3.2-52 shows that emissions from operation of Alternative 3 would be reduced with mitigation. ~~Emissions of NO_x in 2033 and 2038 would be reduced to levels that are less than significant under CEQA.~~ However, emissions of CO and VOC in 2033 and 2038 would remain significant and unavoidable under CEQA.

Section 3.2.4.5, Pages 3.2-184 to 3.2-187, Table 3.2-69

Revise Table 3.2-69, as follows:

Table 3.2-69: Peak Daily Operational Emissions — Alternative 4 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
Year 2019												
Ships: Main Propulsion Engines	122	115	6,865	141	802	462	107	100	5,819	113	748	442
Ships: Aux Engines and Boilers	38	36	1,518	91	138	55	31	29	1,167	80	107	43
AMP Electricity Use	1	1	9	4	4	0	2	2	15	6	8	0
Tugboats	2	2	63	0	134	10	2	2	63	0	134	10
Trucks	155	50	2,515	5	222	69	155	50	2,515	5	222	69
Line Haul Locomotives	23	21	948	1	245	38	23	21	948	1	245	38
Switch Locomotives	0	0	15	0	5	1	0	0	15	0	5	1
Cargo Handling Equipment	3	3	277	2	373	31	3	3	277	2	373	31
Worker Vehicles	16	5	8	0	85	3	16	5	8	0	85	3
Total Operational Year 2019	**360**	**232**	**12,218**	**244**	**2,008**	**668**	**339**	**212**	**10,827**	**207**	**1,926**	**636**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	-103	-71	-541	-839	40	-98	-125	-91	-1,931	-875	-43	-129
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	No	No	No	No	No	No	No	No	No	No
NEPA Impacts												
NEPA Baseline Emissions	367	234	11,841	244	2,006	687	367	234	11,841	244	2,006	687
Project Minus NEPA Baseline	-7	-2	377	0	2	-19	-28	-22	-1,013	-36	-80	-50
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	**Yes**	No	No	No	No	No	No	No	No	No
Year 2026												
Ships: Main Propulsion Engines	131	123	~~7,382~~ 6,192	152	857	492	116	109	5,476	124	803	472
Ships: Aux Engines and Boilers	37	35	1,465	94	134	53	38	36	1,315	96	135	54
AMP Electricity Use	3	3	29	12	15	1	3	3	30	13	15	1
Tugboats	2	1	60	0	143	10	2	1	60	0	143	10
Trucks	171	48	1,100	5	176	37	171	48	1,100	5	176	37
Line Haul Locomotives	21	20	988	1	381	38	21	20	988	1	381	38

Table 3.2-69: Peak Daily Operational Emissions — Alternative 4 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
Switch Locomotives	0	0	16	0	6	1	0	0	16	0	6	1
Cargo Handling Equipment	4	4	147	3	521	34	4	4	147	3	521	34
Worker Vehicles	19	5	5	0	63	2	19	5	5	0	63	2
Total Operational Year 2026	**388**	**241**	**~~11,193~~ 10,003**	**268**	**2,297**	**669**	**374**	**227**	**9,137**	**243**	**2,244**	**650**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	-75	-62	~~-1,565~~ -2,755	-814	329	-97	-90	-76	-3,621	-840	275	-116
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	No	No	No	No	No	No	No	No	No	No
NEPA Impacts												
NEPA Baseline Emissions	344	215	8,523	236	2,058	641	344	215	8,523	236	2,058	641
Project Minus NEPA Baseline	44	26	2,671 1,481	32	239	28	30	12	615	7	186	9
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	**Yes**	No	No	No	No	No	**Yes**	No	No	No
Year 2033												
Ships: Main Propulsion Engines	137	129	~~7,467~~ 3,842	158	903	520	104	98	3,117	96	784	477
Ships: Aux Engines and Boilers	62	59	2,485	146	233	92	56	52	1,128	137	200	80
AMP Electricity Use	1	1	8	3	4	0	2	2	16	7	8	0
Tugboats	2	2	64	0	153	11	2	2	64	0	153	11
Trucks	179	50	877	5	190	34	179	50	877	5	190	34
Line Haul Locomotives	47	44	2,551	6	1,580	94	47	44	2,551	6	1,580	94
Switch Locomotives	0	0	35	0	14	2	0	0	35	0	14	2
Cargo Handling Equipment	6	5	160	4	672	43	6	5	160	4	672	43
Worker Vehicles	22	6	4	0	59	3	22	6	4	0	59	3
Total Operational Year 2033	**457**	**296**	**~~13,651~~ 10,026**	**323**	**3,810**	**800**	**418**	**259**	**7,951**	**255**	**3,662**	**745**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765

Table 3.2-69: Peak Daily Operational Emissions — Alternative 4 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
Project Minus CEQA Baseline	-7	-7	~~893~~ -2,732	-760	1,841	34	-46	-44	-4,808	-828	1,693	-21
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	~~**Yes**~~ *No*	No	**Yes**	No	No	No	No	No	**Yes**	No
NEPA Impacts												
NEPA Baseline Emissions	405	270	7,729	279	3,437	852	405	270	7,729	279	3,437	852
Project Minus NEPA Baseline	52	25	~~5,922~~ 2,297	44	373	-52	13	-12	222	-24	225	-107
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	**Yes**	No	No	No	No	No	**Yes**	No	No	No
Year 2038												
Ships: Main Propulsion Engines	137	129	~~7,467~~ 2,406	158	903	520	104	98	1,920	96	784	477
Ships: Aux Engines and Boilers	62	59	2,485	146	233	92	56	52	803	137	200	80
AMP Electricity Use	1	1	8	3	4	0	1.543	1.543	15.6	6.6	7.7	0.4
Tugboats	1	1	58	0	132	10	1.38	1.23	57.94	0.26	132.11	9.59
Trucks	179	50	790	5	184	32	179	50	790	5	184	32
Line Haul Locomotives	30	27	1,839	6	1,580	69	30	27	1,839	6	1,580	69
Switch Locomotives	0	0	18	0	14	1	0	0	18	0	14	1
Cargo Handling Equipment	6	5	155	4	672	43	6	5	155	4	672	43
Worker Vehicles	22	6	3	0	52	2	22	6	3	0	52	2
Total Operational Year 2038	**438**	**279**	~~**12,823**~~ **7,762**	**323**	**3,775**	**769**	**399**	**241**	**5,603**	**255**	**3,627**	**714**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	-25	-24	~~65~~ -4,996	-760	1,807	4	-65	-62	-7,156	-828	1,658	-51
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	~~**Yes**~~ No	No	**Yes**	No	No	No	No	No	**Yes**	No
NEPA Impacts												

Table 3.2-69: Peak Daily Operational Emissions — Alternative 4 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
NEPA Baseline Emissions	390	257	4,524	279	3,397	827	390	257	4,524	279	3,397	827
Project Minus NEPA Baseline	48	22	~~8,299~~ 3,238	44	378	-58	9	-15	1,078	-24	230	-113
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	**Yes**	No	No	No	No	No	**Yes**	No	No	No

Notes:

Emissions assume the simultaneous occurrence of peak daily equipment activity levels. Such levels would rarely occur during day-to-day terminal operations.

Truck, train, ship, and worker commute emissions include transport within the South Coast Air Basin.

AMP electricity use reflects indirect emissions from regional power generation.

NEPA baseline emissions reflect the NEPA baseline operational, presented in Table 3.2-5.

Emissions might not precisely add due to rounding.

The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

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Section 3.2.4.5, Page 3.2-188

Revise CEQA Impact Determination first paragraph, as follows:

Table 3.2-63 shows that peak daily operational emissions would exceed the SCAQMD daily emission thresholds and would be significant for ~~NO_x and~~ CO in 2033 and 2038 under CEQA.

Section 3.2.4.5, Page 3.2-188

Revise Residual Impacts paragraph, as follows:

> Table 3.2-69 shows that emissions from operation of Alternative 4 would be reduced with mitigation. ~~Emissions of NO_x in 2033 and 2038 would be reduced to levels that are less than significant under CEQA.~~ However, emissions of CO in 2033 and 2038 would remain significant and unavoidable under CEQA.

Section 3.2.4.5, Pages 3.2-225 to 3.2-227, Table 3.2-86

Revise Table 3.2-86, as follows:

Table 3.2-86: Peak Daily Operational Emissions — Alternative 5 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
Year 2019												
Ships: Main Propulsion Engines	127	119	7,113	146	834	480	111	105	6,068	118	779	460
Ships: Aux Engines and Boilers	42	40	1,695	101	154	61	35	33	1,345	90	123	49
AMP Electricity Use	1	1	10	4	5	0	2	2	17	7	8	0
Tugboats	2	2	63	0	134	10	2	2	63	0	134	10
Trucks	164	53	2,664	5	235	73	164	53	2,664	5	235	73
Line Haul Locomotives	27	25	1,099	1	284	44	27	25	1,099	1	284	44
Switch Locomotives	0	0	16	0	5	1	0	0	16	0	5	1
Cargo Handling Equipment	4	3	306	2	393	34	4	3	306	2	393	34
Worker Vehicles	17	5	8	0	88	3	17	5	8	0	88	3
Total Operational Year 2019	**383**	**247**	**12,976**	**260**	**2,131**	**706**	**361**	**227**	**11,586**	**224**	**2,049**	**675**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	-81	-56	217	-822	163	-59	-102	-76	-1,172	-859	80	-91
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	**Yes**	No	No	No	No	No	No	No	No	No
NEPA Impacts												
NEPA Baseline Emissions	367	234	11,841	244	2,006	687	367	234	11,841	244	2,006	687
Project Minus NEPA Baseline	16	13	1,135	17	126	19	-6	-7	-254	-20	43	-12
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	**Yes**	No	No	No	No	No	No	No	No	No
Year 2026												
Ships: Main Propulsion Engines	132	124	~~7,148~~ 6,293	150	876	506	117	110	5,576	122	822	487
Ships: Aux Engines and Boilers	50	47	1,942	117	185	73	43	41	1,487	107	154	61
AMP Electricity Use	2	2	23	10	11	1	3	3	29	12	14	1
Tugboats	2	1	60	0	143	10	2	1	60	0	143	10
Trucks	191	54	1,231	6	198	42	191	54	1,231	6	198	42
Line Haul Locomotives	26	24	1,191	2	459	45	26	24	1,191	2	459	45
Switch Locomotives	0	0	18	0	7	1	0	0	18	0	7	1
Cargo Handling Equipment	5	4	158	3	552	38	5	4	158	3	552	38
Worker Vehicles	20	6	5	0	68	3	20	6	5	0	68	3
Total Operational Year 2026	**427**	**263**	**~~11,777~~**	**288**	**2,500**	**719**	**406**	**243**	**9,756**	**252**	**2,418**	**688**

Table 3.2-86: Peak Daily Operational Emissions — Alternative 5 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
			~~10,922~~									
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	-36	-40	~~-982~~ -1,837	-794	531	-46	-58	-60	-3,002	-831	449	-77
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	No	No	No	No	No	No	No	No	No	No
NEPA Impacts												
NEPA Baseline Emissions	344	215	8,523	236	2,058	641	344	215	8,523	236	2,058	641
Project Minus NEPA Baseline	83	48	~~3,255~~ 2,400	53	442	79	62	28	1,234	16	360	48
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	**Yes**	No	No	**Yes**	No	No	**Yes**	No	No	No
Year 2033												
Ships: Main Propulsion Engines	190	178	~~10,544~~ 5,862	226	1,216	692	156	146	4,915	162	1,095	649
Ships: Aux Engines and Boilers	46	43	1,854	102	176	69	43	41	1,093	100	162	64
AMP Electricity Use	1	1	12	5	6	0	2	2	17	7	8	0
Tugboats	2	2	85	0	204	15	2	2	85	0	204	15
Trucks	203	57	1,007	6	219	39	203	57	1,007	6	219	39
Line Haul Locomotives	59	54	3,150	8	1,950	116	59	54	3,150	8	1,950	116
Switch Locomotives	1	1	39	0	16	2	1	1	39	0	16	2
Cargo Handling Equipment	6	5	170	4	707	48	6	5	170	4	707	48
Worker Vehicles	24	7	4	0	64	3	24	7	4	0	64	3
Total Operational Year 2033	**531**	**348**	**~~16,867~~ 12,185**	**351**	**4,559**	**985**	**495**	**314**	**10,481**	**288**	**4,425**	**936**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	68	45	~~4,109~~ -573	-732	2,590	219	32	11	-2,277	-795	2,457	171
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	~~**Yes**~~ No	No	**Yes**	**Yes**	No	No	No	No	**Yes**	**Yes**

Table 3.2-86: Peak Daily Operational Emissions — Alternative 5 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**
NEPA Impacts												
NEPA Baseline Emissions	405	270	7,729	279	3,437	852	405	270	7,729	279	3,437	852
Project Minus NEPA Baseline	127	78	~~9,138~~ 4,456	72	1,122	133	91	44	2,752	9	988	84
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	**Yes**	**Yes**	No	**Yes**	**Yes**	No	No	**Yes**	No	**Yes**	**Yes**
Year 2038												
Ships: Main Propulsion Engines	190	178	~~10,544~~ 3,541	226	1,216	692	156	146	3,042	162	1,095	649
Ships: Aux Engines and Boilers	46	43	1,854	102	176	69	43	41	745	100	162	64
AMP Electricity Use	1	1	12	5	6	0	2	2	17	7	8	0
Tugboats	2	2	77	0	176	13	2	2	77	0	176	13
Trucks	203	56	907	6	212	37	203	56	907	6	212	37
Line Haul Locomotives	37	34	2,271	8	1,950	85	37	34	2,271	8	1,950	85
Switch Locomotives	0	0	21	0	16	1	0	0	21	0	16	1
Cargo Handling Equipment	6	5	164	4	707	48	6	5	164	4	707	48
Worker Vehicles	24	7	4	0	56	3	24	7	4	0	56	3
Total Operational Year 2038	**508**	**327**	**~~15,856~~ 8,853**	**351**	**4,516**	**947**	**472**	**293**	**7,249**	**288**	**4,382**	**899**
CEQA Impacts												
CEQA Baseline Emissions	464	303	12,759	1,083	1,969	765	464	303	12,759	1,083	1,969	765
Project Minus CEQA Baseline	45	24	~~3,097~~ -3,906	-732	2,547	182	8	-10	-5,510	-795	2,414	133
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	No	~~**Yes**~~ No	No	**Yes**	**Yes**	No	No	No	No	**Yes**	**Yes**
NEPA Impacts												
NEPA Baseline Emissions	390	257	4,524	279	3,397	827	390	257	4,524	279	3,397	827
Project Minus NEPA Baseline	118	70	~~11,332~~ 4,329	72	1,119	120	82	36	2,724	9	985	72
Significance Threshold	150	55	55	150	550	55	150	55	55	150	550	55
Significant?	No	**Yes**	**Yes**	No	**Yes**	**Yes**	No	No	**Yes**	No	**Yes**	**Yes**

Notes:

Table 3.2-86: Peak Daily Operational Emissions — Alternative 5 (lbs/day)

	Without Mitigation						With Mitigation					
Source Category	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**NO_X**	**SO_X**	**CO**	**VOC**

Emissions assume the simultaneous occurrence of peak daily equipment activity levels. Such levels would rarely occur during day-to-day terminal operations.

Truck, train, ship, and worker commute emissions include transport within the South Coast Air Basin.

AMP electricity use reflects indirect emissions from regional power generation.

Emissions might not precisely add due to rounding.

The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

1

Section 3.2.4.5, Page 3.2-228

Revise CEQA Impact Determination first paragraph, as follows:

Table 3.2-86 shows that unmitigated peak daily operational emissions would exceed the SCAQMD daily emission thresholds and would be significant for NO_X under CEQA in years ~~s~~ 2019~~, 2033, and 2038~~. Emissions of CO and VOC would ~~also~~ exceed the SCAQMD daily emission thresholds in 2033 and 2038.

Section 3.2.4.6, Pages 3.2-247 to 3.2-259, Table 3.2-93

Revise Table 3.2-93, as follows:

Table 3.2-93: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Residual Impacts after Mitigation
Proposed Project	**AQ-1:** The proposed Project would result in construction-related emissions that exceed an SCAQMD threshold of significance in Table 3.2-6.	CEQA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for NO_X in 2019.	CEQA: **MM AQ-1: Harbor Craft Used During Construction.** **MM AQ-2: On-Road Trucks Used during Construction.** **MM AQ-3: Non-Road Construction Equipment.** **MM AQ-4: Cargo Ships Used During Construction.** **MM AQ-5: General Construction Mitigation Measure.**	CEQA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X in 2019.
		NEPA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for $PM_{2.5}$, NO_X, and VOC in 2019.	NEPA: **MM AQ-1 through MM AQ-5**	NEPA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X and VOC in 2019.
	AQ-2: Proposed Project construction would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-7.	CEQA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for NO_2 (federal 1-hour average) and PM_{10} (24-hour and annual average).	CEQA: **MM AQ-1 through MM AQ-5**	CEQA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for NO_2 (federal 1-hour average) and PM_{10} (24-hour and annual average).
		NEPA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal 1-	NEPA: **MM AQ-1 through MM AQ-5**	NEPA: Maximum off-site ambient air pollutant concentrations would be

Table 3.2-93: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Residual Impacts after Mitigation
		hour average). Overlapping construction and operations would be significant for NO_2 (federal 1-hour average).		significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for NO_2 (federal 1-hour average).
	AQ-3: The proposed Project would result in operational emissions that exceed an SCAQMD threshold of significance in Table 3.2-8.	CEQA: Operations would be significant for NO_X in 2019~~, 2033, and 2038~~ and CO and VOC in 2033 and 2038.	CEQA: **MM AQ-6: Vessel Speed Reduction Program (VSRP).** **MM AQ-7: Alternative Maritime Power (AMP).** **LM AQ-1: Replacement of Equipment and Review of New Technology.** **LM AQ-2: Priority Access System.**	CEQA: Operations would be significant and unavoidable for CO and VOC in 2033 and 2038.
		NEPA: Operations would be significant for NO_X in 2019, 2026, 2033, and 2038; VOC in 2026, 2033, and 2038; and CO and $PM_{2.5}$ in 2033 and 2038.	NEPA: **MM AQ-6, MM AQ-7, LM AQ-1, and LM AQ-2**	NEPA: Operations would be significant and unavoidable for NO_X in 2026, 2033, 2038 and CO and VOC in 2033 and 2038.
	AQ-4: Proposed project operations would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-9.	CEQA: Operations would be significant for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).	CEQA: **MM AQ-6 and MM AQ-7**	CEQA: Operations would be significant and unavoidable for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).
		NEPA: Operations would be significant for PM_{10} (24-hour and annual averages).	NEPA: **MM AQ-6 and MM AQ-7**	NEPA: Operations would be significant and unavoidable for PM_{10} (24-hour and annual averages).

Table 3.2-93: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Residual Impacts after Mitigation
	AQ-5: The proposed Project would not generate on-road traffic that would contribute to an exceedance of the 1-hour or 8-hour CO standards.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant	NEPA: No mitigation is required	NEPA: Less than significant
	AQ-6: The proposed Project would not create an objectionable odor at the nearest sensitive receptor.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant	NEPA: No mitigation is required	NEPA: Less than significant
	AQ-7: The proposed Project would expose receptors to significant levels of TACs.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Construction and operation would be significant for individual cancer risk and population cancer burden.	NEPA: **MM AQ-1 through MM AQ-7, LM AQ-1, and LM AQ-2**	NEPA: Less than significant
	AQ-8: The proposed Project would not conflict with or obstruct implementation of an applicable AQMP.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant.
		NEPA: Less than significant	NEPA: No mitigation is required	NEPA: Less than significant
Alternative 1 – No Federal Action	**AQ-1:** Alternative 1 would not result in construction-related emissions that exceed an SCAQMD threshold of significance in Table 3.2-6.	CEQA: Construction would be significant for NO_X in 2018. Overlapping construction and operations would be significant for NO_X in 2018 and 2019.	CEQA: **MM AQ-1 through MM AQ-5**	CEQA: Less than significant.
		NEPA: No impact	NEPA: Mitigation is not applicable	NEPA: No impact
	AQ-2: Alternative 1	CEQA: Construction would be	CEQA: **MM AQ-1 through**	CEQA: Construction would be

Table 3.2-93: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Residual Impacts after Mitigation
	construction would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-7.	significant for construction NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for PM_{10} (annual average).	**MM AQ-5**	significant and unavoidable for construction NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for PM_{10} (annual average).
		NEPA: No impact.	NEPA: Mitigation is not applicable	NEPA: No impact.
	AQ-3: Alternative 1 would result in operational emissions that exceed an SCAQMD threshold of significance in Table 3.2-8.	CEQA: Operations would be significant for NO_X in 2019~~, 2033, and 2038~~ and CO and VOC in 2033 and 2038.	CEQA: **MM AQ-6 and MM AQ-7**	CEQA: Operations would be significant and unavoidable for CO and VOC in 2033 and 2038.
		NEPA: No impact	NEPA: Mitigation is not applicable	NEPA: No impact.
	AQ-4: Alternative 1 operations would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-9.	CEQA: Operations would be significant for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).	CEQA: **MM AQ-6 and MM AQ-7**	CEQA: Operations would be significant and unavoidable for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).
		NEPA: No impact	NEPA: Mitigation is not applicable	NEPA: No impact
	AQ-5: Alternative 1 would not generate on-road traffic that would contribute to an exceedance of the 1-hour or 8-hour CO standards.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: No impact	NEPA: Mitigation is not applicable	NEPA: No impact
	AQ-6: Alternative 1 would not create an objectionable odor at the nearest sensitive receptor.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: No impact	NEPA: Mitigation is not applicable	NEPA: No impact

Table 3.2-93: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Residual Impacts after Mitigation
	AQ-7: Alternative 1 would not expose receptors to significant levels of TACs.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: No impact	NEPA: Mitigation is not applicable	NEPA: No impact
	AQ-8: Alternative 1 would not conflict with or obstruct implementation of an applicable AQMP.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant	NEPA: Mitigation is not applicable	NEPA: Less than significant
Alternative 2 – No Project	**AQ-1:** Alternative 2 would not result in construction-related emissions that exceed an SCAQMD threshold of significance in Table 3.2-6.	CEQA: No impact	CEQA: No mitigation is required	CEQA: No impact
		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
	AQ-2: Alternative 2 construction would not result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-7.	CEQA: No impact	CEQA: No mitigation is required	CEQA: No impact
		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
	AQ-3: Alternative 2 would result in operational emissions that exceed an SCAQMD threshold of significance in Table 3.2-8.	CEQA: Operations would be significant for NO_X in 2019~~, 2033, and 2038~~ and CO and VOC in 2033 and 2038.	CEQA: Mitigation is not applicable	CEQA: Operations would be significant and unavoidable for NO_X in 2019~~, 2033, and 2038~~ and CO and VOC in 2033 and 2038.
		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
	AQ-4: Alternative 2 operations would result in off-site ambient air pollutant concentrations	CEQA: Operations would be significant for PM_{10} (24-hour and annual averages).	CEQA: Mitigation is not applicable	CEQA: Operations would be significant and unavoidable for PM_{10} (24-hour and annual averages).

Table 3.2-93: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Residual Impacts after Mitigation
	that exceed a SCAQMD threshold of significance in Table 3.2-9.	NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
	AQ-5: Alternative 2 would not generate on-road traffic that would contribute to an exceedance of the 1-hour or 8-hour CO standards.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
	AQ-6: Alternative 2 would not create an objectionable odor at the nearest sensitive receptor.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
	AQ-7: Alternative 2 would not expose receptors to significant levels of TACs.	CEQA: Less than significant	CEQA: Mitigation is not applicable	CEQA: Less than significant
		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
	AQ-8: Alternative 2 would not conflict with or obstruct implementation of an applicable AQMP.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Not applicable	NEPA: Mitigation is not applicable	NEPA: Not applicable
Alternative 3 – Reduced Project: Reduced Wharf Improvements	**AQ-1:** Alternative 3 would result in construction-related emissions that exceed an SCAQMD threshold of significance in Table 3.2-6.	CEQA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for NO_X in 2019.	CEQA: **MM AQ-1 through MM AQ-5**	CEQA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X in 2019.
		NEPA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for	NEPA: **MM AQ-1 through MM AQ-5**	NEPA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations

Table 3.2-93: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Residual Impacts after Mitigation
		NO_X and VOC in 2019.		would be significant and unavoidable for NO_X and VOC in 2019.
	AQ-2: Alternative 3 construction would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-7.	CEQA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for PM_{10} (24-hour and annual average).	CEQA: **MM AQ-1 through MM AQ-5**	CEQA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for PM_{10} (24-hour and annual average).
		NEPA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for NO_2 (federal 1-hour average).	NEPA: **MM AQ-1 through MM AQ-5**	NEPA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for NO_2 (federal 1-hour average).
	AQ-3: Alternative 3 would result in operational emissions that exceed an SCAQMD threshold of significance in Table 3.2-8.	CEQA: Operations would be significant for ~~NO_X,~~ CO and VOC in 2033 and 2038.	CEQA: **MM AQ-6, MM AQ-7, LM AQ-1, and LM AQ-2**	CEQA: Operations would be significant and unavoidable for CO and VOC in 2033 and 2038.
		NEPA: Operations would be significant for NO_X in 2019, 2026, 2033, and 2038; $PM_{2.5}$, CO, and VOC in 2033 and 2038.	NEPA: **MM AQ-6, MM AQ-7, LM AQ-1, and LM AQ-2**	NEPA: Operations would be significant and unavoidable for NO_X in 2026, 2033, and 2038 and CO in 2033 and 2038.
	AQ-4: Alternative 3 operations would result in off-site ambient air pollutant concentrations	CEQA: Operations would be significant for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-	CEQA: **MM AQ-6 and MM AQ-7**	CEQA: Operations would be significant and unavoidable for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual

Table 3.2-93: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Residual Impacts after Mitigation
	that exceed a SCAQMD threshold of significance in Table 3.2-9.	hour average).		averages), and $PM_{2.5}$ (24-hour average).
		NEPA: Operations would be significant for PM_{10} (24-hour and annual averages).	NEPA: **MM AQ-6 and MM AQ-7**	NEPA: Operations would be significant and unavoidable for PM_{10} (24-hour and annual averages).
	AQ-5: Alternative 3 would not generate on-road traffic that would contribute to an exceedance of the 1-hour or 8-hour CO standards.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant	CEQA: No mitigation is required	NEPA: Less than significant
	AQ-6: Alternative 3 would not create an objectionable odor at the nearest sensitive receptor.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant	NEPA: No mitigation is required	NEPA: Less than significant
	AQ-7: Alternative 3 would expose receptors to significant levels of TACs.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Construction and operation would be significant for individual cancer risk.	NEPA: **MM AQ-1 through MM AQ-7, LM AQ-1, and LM AQ-2**	NEPA: Less than significant
	AQ-8: Alternative 3 would not conflict with or obstruct implementation of an applicable AQMP.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant.
		NEPA: Less than significant	NEPA: No mitigation is required	NEPA: Less than significant
Alternative 4 – Reduced Project: No Backland Improvements	**AQ-1:** Alternative 4 would result in construction-related emissions that exceed an SCAQMD threshold of significance in	CEQA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for	CEQA: **MM AQ-1 through MM AQ-5**	CEQA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations

Table 3.2-93: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Residual Impacts after Mitigation
	Table 3.2-6.	NO_X in 2019.		would be significant and unavoidable for NO_X in 2019.
		NEPA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for NO_X and VOC in 2019.	NEPA: **MM AQ-1 through MM AQ-5**	NEPA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X in 2019.
	AQ-2: Alternative 4 construction would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-7.	CEQA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for PM_{10} (annual average).	CEQA: **MM AQ-1 through MM AQ-5**	CEQA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for PM_{10} (annual average).
		NEPA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for NO_2 (federal 1-hour average).	NEPA: **MM AQ-1 through MM AQ-5**	NEPA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for NO_2 (federal 1-hour average).
	AQ-3: Alternative 4 would result in operational emissions that exceed an SCAQMD threshold of significance in Table 3.2-8.	CEQA: Operations would be significant for ~~NO_X and~~ CO in 2033 and 2038.	CEQA: **MM AQ-6, MM AQ-7, LM AQ-1, and LM AQ-2**	CEQA: Operations would be significant and unavoidable for CO in 2033 and 2038.
		NEPA: Operations would be significant for NO_X in 2019, 2026, 2033, and 2038.	NEPA: **MM AQ-6, MM AQ-7, LM AQ-1, and LM AQ-2**	NEPA: Operations would be significant and unavoidable for NO_X in 2026, 2033, and 2038.

Table 3.2-93: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Residual Impacts after Mitigation
	AQ-4: Alternative 4 operations would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-9.	CEQA: Operations would be significant for PM_{10} (24-hour and annual averages).	CEQA: **MM AQ-6 and MM AQ-7**	CEQA: Operations would be significant and unavoidable for PM_{10} (24-hour and annual averages).
		NEPA: Operations would be significant for NO_2 (federal 1-hour and state annual average) and PM_{10} (24-hour and annual averages).	NEPA: **MM AQ-6 and MM AQ-7**	NEPA: Operations would be significant and unavoidable for NO_2 (federal 1-hour and state annual average) and PM_{10} (24-hour and annual averages).
	AQ-5: Alternative 4 would not generate on-road traffic that would contribute to an exceedance of the 1-hour or 8-hour CO standards.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant	NEPA: No mitigation is required	NEPA: Less than significant
	AQ-6: Alternative 4 would not create an objectionable odor at the nearest sensitive receptor.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant	NEPA: No mitigation is required	NEPA: Less than significant
	AQ-7: Alternative 4 would not expose receptors to significant levels of TACs.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant	NEPA: No mitigation is required	NEPA: Less than significant
	AQ-8: Alternative 4 would not conflict with or obstruct implementation of an applicable AQMP.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant.
		NEPA: Less than significant	NEPA: No mitigation is required	NEPA: Less than significant

Table 3.2-93: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Residual Impacts after Mitigation
Alternative 5 – Expanded On-Dock Railyard: Wharf and Backland Improvements with an Expanded TICTF	**AQ-1:** Alternative 5 would result in construction-related emissions that exceed an SCAQMD threshold of significance in Table 3.2-6.	CEQA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for NO_X in 2019.	CEQA: **MM AQ-1 through MM AQ-5**	CEQA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X in 2019.
		NEPA: Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for $PM_{2.5}$, NO_X, and VOC in 2019.	NEPA: **MM AQ-1 through MM AQ-5**	NEPA: Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X and VOC in 2019.
	AQ-2: Alternative 5 construction would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-7.	CEQA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal and state 1-hour average). Overlapping construction and operations would be significant for PM_{10} (24-hour and annual average).	CEQA: **MM AQ-1 through MM AQ-5**	CEQA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for PM_{10} (24-hour and annual average).
		NEPA: Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant for NO_2 (federal 1-hour average).	NEPA: **MM AQ-1 through MM AQ-5**	NEPA: Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for NO_2 (federal 1-hour average).

Table 3.2-93: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Residual Impacts after Mitigation
	AQ-3: Alternative 5 would result in operational emissions that exceed an SCAQMD threshold of significance in Table 3.2-8.	CEQA: Operations would be significant for NO_X in 2019~~, 2033, and 2038~~ and CO and VOC in 2033 and 2038.	**CEQA: MM AQ-6, MM AQ-7, LM AQ-1, and LM AQ-2**	CEQA: Operations would be significant and unavoidable for CO and VOC in 2033 and 2038.
		NEPA: Operations would be significant for NO_X in 2019, 2026, 2033, and 2038; VOC in 2026, 2033, and 2038; and $PM_{2.5}$ and CO in 2033 and 2038.	NEPA: **MM AQ-6, MM AQ-7, LM AQ-1, and LM AQ-2**	NEPA: Operations would be significant and unavoidable for NO_X in 2026, 2033, 2038 and CO and VOC in 2033 and 2038.
	AQ-4: Alternative 5 operations would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-9.	CEQA: Operations would be significant for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).	CEQA: **MM AQ-6 and MM AQ-7**	CEQA: Operations would be significant and unavoidable for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).
		NEPA: Operations would be significant for PM_{10} (24-hour and annual averages).	NEPA: **MM AQ-6 and MM AQ-7**	NEPA: Operations would be significant and unavoidable for PM_{10} (24-hour and annual averages).
	AQ-5: Alternative 5 would not generate on-road traffic that would contribute to an exceedance of the 1-hour or 8-hour CO standards.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant	NEPA: No mitigation is required	NEPA: Less than significant
	AQ-6: Alternative 5 would not create an objectionable odor at the nearest sensitive receptor.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant
		NEPA: Less than significant	NEPA: No mitigation is required	NEPA: Less than significant
	AQ-7: Alternative 5 would	CEQA: Less than significant	CEQA: No mitigation is	CEQA: Less than significant

Table 3.2-93: Summary Matrix of Potential Impacts and Mitigation Measures for Air Quality Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Mitigation Measures	Residual Impacts after Mitigation
	expose receptors to significant levels of TACs.		required	
		NEPA: Construction and operation would be significant for individual cancer risk and population cancer burden.	NEPA: **MM AQ-1 through MM AQ-7, LM AQ-1, and LM AQ-2**	NEPA: Less than significant
	AQ-8: Alternative 5 would not conflict with or obstruct implementation of an applicable AQMP.	CEQA: Less than significant	CEQA: No mitigation is required	CEQA: Less than significant.
		NEPA: Less than significant	NEPA: No mitigation is required	NEPA: Less than significant

1

Section 3.2.4.7, Pages 3.2-360 to 3.2-362

Under Impacts AQ-1, AQ-2 and AQ-7 revise mitigation measures MM AQ-2, MM AQ-3, MM AQ-5, and MM AQ-7, as follows:

Mitigation Measure	**MM AQ-2. On-Road Trucks Used during Construction.** On-road trucks shall comply with EPA 2010 on-road emission standards or better, unless the contractor ~~can reasonably demonstrate~~ provides a written finding consistent with project contract or lease management requirements and obtains written approval from the Lead Agency that such equipment is unavailable ~~to the satisfaction of LAHD~~.
Timing	During specified construction phases.
Methodology	LAHD will include MM AQ-2 in the contract specifications for construction. LAHD will monitor implementation of mitigation measures during construction.
Responsible Parties	LAHD.
Residual Impacts	Significant and unavoidable
Mitigation Measure	**MM AQ-3. Non-Road Construction Equipment** (except vessels, harbor craft, on-road trucks, and dredging equipment). All non-road construction equipment greater than 50 hp must meet EPA Tier 4 emission standards, unless the contractor ~~can reasonably demonstrate~~ provides a written finding consistent with project contract or lease management requirements and obtains written approval from the Lead Agency that such equipment is unavailable ~~to the satisfaction of LAHD~~.
Timing	During specified construction phases.
Methodology	LAHD will include MM AQ-3 in the contract specifications for construction. LAHD will monitor implementation of mitigation measures during construction.
Responsible Parties	LAHD.
Mitigation Measure	MM AQ-4. Cargo Ships Used During Construction. All ships and barges used primarily to deliver construction-related materials or cranes shall comply with the expanded Vessel Speed Reduction Program (VSRP) of 12 knots between 40 nautical miles (nm) from Point Fermin and the Precautionary Area.
Timing	During specified construction phases or crane deliveries.
Methodology	LAHD will include MM AQ-4 in the contract specifications for construction. LAHD will monitor implementation of mitigation measures during construction. For crane deliveries, LAHD will include this mitigation measure in lease agreements with tenants.
Responsible Parties	Everport, LAHD.
Residual Impacts	Significant and unavoidable
Mitigation Measure	**MM AQ-5. General Construction Mitigation Measure.** All dredging equipment must be electric; however, this is subject to availability of the equipment. For MM AQ-1 through MM AQ-4, if a CARB-certified technology becomes available that is as good as or better than the existing measure in terms of emissions performance, the technology could replace the existing technology if approved by LAHD.
Timing	During specified construction phases.
Methodology	LAHD will include MM AQ-5 in the contract specifications for construction. LAHD will monitor implementation of mitigation measures during construction.

Responsible Parties	LAHD
Residual Impacts	Significant and unavoidable
Impact AQ-3: The proposed Project would result in operational emissions that exceed an SCAQMD threshold of significance in Table 3.2-8. (*Also applies to Impact AQ-3 for Alternatives 1 and 3 through 5)* **Impact AQ-7:** The proposed Project would expose receptors to significant levels of TACs. (*Also applies to Impact AQ-7 for Alternatives 3 and 5)*	
Mitigation Measure	**MM AQ-6. Vessel Speed Reduction Program (VSRP).** Starting January 1, 2019 and thereafter, 95 percent of Evergreen ships calling at the Everport Container Terminal shall be required to comply with the expanded VSRP at 12 knots between 40 nm from Point Fermin and the Precautionary Area. Starting January 1, 2026, 95 percent of all ships calling at the Everport Container Terminal will follow this requirement. Alternative Compliance Plans will be considered where a different speed that would result in fewer emissions compared to the current speed limits. Any alternative compliance plan shall be submitted to LAHD at least 90 days in advance for approval and shall be supported by data that demonstrates the ability of the alternative compliance plan for the specific vessel and type to achieve emissions reductions comparable to or greater than those achievable by compliance with VSRP. The alternative compliance plan shall be implemented once written notice of approval is granted by the LAHD.
Timing	During operation.
Methodology	LAHD will include this mitigation measure in lease agreements with tenants.
Responsible Parties	Everport, LAHD.
Residual Impacts	Significant and unavoidable.
Mitigation Measure	**MM AQ-7. Alternative Maritime Power (AMP).** By 2020 or upon substantial completion of construction, ~~85~~90 percent of Evergreen ships calling at the Everport Terminal must use AMP. By 2026, 95 percent of all ship calls at the Everport Container Terminal must use AMP or approved equivalent under the CARB Shore-Power Regulation. The equivalent alternative technology must, at a minimum, meet the emissions reductions that would be achieved from AMP.
Timing	During operation.
Methodology	LAHD will include this mitigation measure in lease agreements with tenants.
Responsible Parties	Everport, LAHD.
Residual Impacts	Significant and unavoidable.

Section 3.2.5.2, Page 3.2-264

Revise the first four paragraphs as follows:

Emissions from proposed project operation would exceed significance thresholds for NO_X in 2019~~, 2033, and 2038~~ and CO and VOC in 2033 and 2038 under CEQA; after mitigation, emissions would remain significant and unavoidable for CO and VOC in 2033 and 2038. Emissions from proposed project operation would exceed significance thresholds for NO_X in 2019, 2026, 2033, and 2038, for VOC in 2026, 2033, and 2038, and for CO and $PM_{2.5}$ in 2033 and 2038 under NEPA; after mitigation, emissions would

remain significant and unavoidable for NO_X in 2026, 2033, and 2038 and for CO and VOC in 2033 and 2038. Impact determinations would be the same for Alternative 5 as for the proposed Project. Impact determinations under CEQA would be the same for Alternative 1 as for the proposed Project. Alternative 1 would have the same conditions as the NEPA baseline; therefore, there would be no impacts under NEPA.

Emissions from Alternative 2 operation would exceed significance thresholds for NO_X in 2019~~, 2033, and 2038~~ and for CO and VOC in 2033 and 2038 under CEQA. Mitigation is not required because there would be no discretionary action under CEQA for Alternative 2. Emissions would remain significant and unavoidable for NO_X in 2019~~, 2033, and 2038~~ and for CO and VOC in 2033 and 2038 under CEQA. Alternative 2 is not analyzed under NEPA.

Emissions from Alternative 3 operation would exceed significance thresholds for ~~NO_X,~~ CO~~,~~ and VOC in 2033 and 2038 under CEQA; after mitigation, emissions would remain significant and unavoidable for CO and VOC in 2033 and 2038. Emissions from Alternative 3 operation would exceed significance thresholds for NO_X in 2019, 2026, 2033, and 2038 and for $PM_{2.5}$, CO, and VOC in 2033, and 2038 under NEPA; after mitigation, emissions would remain significant and unavoidable for NO_X in 2026, 2033, and 2038 and for CO in 2033 and 2038.

Emissions from Alternative 4 operation would exceed significance thresholds for ~~NO_X~~ ~~and~~ CO in 2033 and 2038 under CEQA; after mitigation, emissions would remain significant and unavoidable for CO in 2033 and 2038. Emissions from Alternative 4 operation would exceed significance thresholds for NO_X in 2019, 2026, 2033, and 2038 under NEPA; after mitigation, emissions would remain significant and unavoidable for NO_X in 2026, 2033, and 2038.

3.2.3 Changes Made to Section 3.3, Biological Resources

Section 3.3.4.3, Page 3.3-36

Revise the footnote to mitigation measure MM BIO-1, as follows:

MM BIO-1 **Protect Marine Mammals.** Although it is expected that marine mammals will voluntarily move away from the area at the commencement of the vibratory or "soft start" of pile driving activities, as a precautionary measure, pile driving activities occurring as part of the sheet pile and king pile installation will include establishment of a safety zone, by a qualified marine mammal professional, and the area surrounding the operations (including the safety zones) will be monitored for marine mammals by a qualified marine mammal observer.[1]

The pile driving site will move with each new pile; therefore, the safety zones will move accordingly.

[1] Marine mammal professional qualifications shall be identified based on criteria established by LAHD during the construction bid specification process. Upon selection as part of the construction award winning team, the qualified marine mammal professional shall develop site specific pile driving safety zone requirements, which shall follow NOAA Fisheries Technical Guidance Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (NOAA Fisheries 2016) in consultation with the Acoustic Threshold White

Paper prepared for this purpose by LAHD (LAHD 2017). Final pile driving safety zone requirements developed by the selected marine mammal professional shall be submitted to LAHD Construction and Environmental Management Divisions ~~prior to commencement of pile driving~~.

Section 3.3.4.5, Page 3.3-90

Under Impact BIO-1 revise the footnote to mitigation measure MM BIO-1, as follows:

Mitigation Measure	**MM BIO-1: Protect Marine Mammals.** Although it is expected that marine mammals will voluntarily move away from the area at the commencement of the vibratory or "soft start" of pile-driving activities, as a precautionary measure, pile-driving activities occurring as part of the sheet pile and king pile installation will include establishment of level B (harassment) and level A (injury) safety zones by a qualified marine mammal professional, and the area surrounding the operations (including the safety zones) will be monitored for marine mammals by a qualified marine mammal observer.[1] The pile-driving site will move with each new pile; therefore, the safety zones will move accordingly. [1] Marine mammal professional qualifications shall be identified based on criteria established by LAHD during the construction bid specification process. Upon selection as part of the construction award winning team, the qualified marine mammal professional shall develop site specific pile-driving safety zone requirements, which shall follow NOAA Fisheries Technical Guidance Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (NOAA Fisheries 2016) in consultation with the Acoustic Threshold White Paper prepared for this purpose by LAHD (LAHD 2017). Final pile-driving safety zone requirements developed by the selected marine mammal professional shall be submitted to LAHD Construction and Environmental Management Divisions ~~prior to commencement of pile-driving~~.

3.2.4 Changes Made to Section 3.5, Greenhouse Gas Emissions

Section 3.5.5.2, Page 3.5-17, Table 3.5-1

Revise Table 3.5-1, as follows:

Table 3.5-1: Annual Operational GHG Emissions—CEQA Baseline 2013 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e [1]
Ships—transit and anchoring	49,200	1	3	49,906
Ships—hoteling	7,488	1	22	13,443
AMP electricity use	2,436	<1	<1	2,441
Tugboats	617	<1	<1	625
Trucks	55,872	<1	2	56,418
Line haul locomotives	~~27,731~~ *19,200*	2	1	~~27,987~~ *19,378*
Switch locomotives	267	<1	<1	269
Cargo handling equipment	18,398	1	<1	18,523
On-terminal electricity use	4,469	<1	<1	4,479

Table 3.5-1: Annual Operational GHG Emissions—CEQA Baseline 2013 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e [1]
Worker vehicles	1,902	<1	<1	1,986
2013 Baseline Total	~~168,382~~ *159,849*	5	28	~~176,076~~ *167,468*

Notes:

Emissions might not add precisely due to rounding. For more explanation, refer to the discussion in Section 3.2.4.1 in Section 3.2, Air Quality and Meteorology. The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

On-terminal electricity use includes crane operation and high mast poles.

Section 3.5.5.2, Pages 3.5-20 to 3.5-21, Table 3.5-3

Revise Table 3.5-3, as follows:

Table 3.5-3: Annual Operational GHG Emissions – NEPA Baseline (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Amortized Construction				47
Year 2018				
Ships - Transit and Anchoring	53,821	1	3	54,591
Ships – Hoteling	8,780	<1	1	8,921
AMP Electricity Use	2,436	<1	<1	2,441
Tugboats	784	<1	<1	793
Trucks	51,656	<1	2	52,135
Line Haul Locomotives	~~30,064~~ 20,123	2	1	~~30,342~~ 20,309
Switch Locomotives	272	<1	<1	274
Cargo Handling Equipment	15,262	<1	<1	15,361
On-terminal Electricity Use	4,509	<1	<1	4,519
Worker Vehicles	3,412	<1	1	3,565
Total Operational Year 2018	~~170,996~~ 161,055	5	7	~~172,942~~ 162,909
Total Construction and Operations Year 2018				~~172,989~~ 162,956
Year 2019				
Ships - Transit and Anchoring	53,906	1	3	54,679
Ships – Hoteling	8,707	<1	1	8,848
AMP Electricity Use	2,639	<1	<1	2,645
Tugboats	793	<1	<1	802

Table 3.5-3: Annual Operational GHG Emissions – NEPA Baseline (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Trucks	56,315	<1	2	56,836
Line Haul Locomotives	~~30,693~~ 20,181	2	1	~~30,977~~ 20,367
Switch Locomotives	275	<1	<1	277
Cargo Handling Equipment	15,611	1	<1	15,712
On-terminal Electricity Use	3,276	<1	<1	3,283
Worker Vehicles	3,176	<1	1	3,329
Total Operational Year 2019	~~175,392~~ 164,879	5	7	~~177,388~~ 166,778
Total Construction and Operations Year 2019				~~177,435~~ 166,825
Year 2026				
Ships - Transit and Anchoring	54,909	1	3	55,697
Ships – Hoteling	8,460	<1	1	8,599
AMP Electricity Use	3,046	<1	<1	3,052
Tugboats	793	<1	<1	802
Trucks	50,297	<1	2	50,753
Line Haul Locomotives	~~32,958~~ 21,533	~~3~~ 2	1	~~33,263~~ 21,732
Switch Locomotives	318	<1	<1	321
Cargo Handling Equipment	17,464	1	<1	17,577
On-terminal Electricity Use	3,536	<1	<1	3,544
Worker Vehicles	2,703	<1	1	2,865
Total Operational Year 2026	~~174,484~~ 163,059	~~5~~ 6	7	~~176,472~~ 164,942
Total Construction and Operations Year 2026				~~176,519~~ 164,989
Year 2033				
Ships - Transit and Anchoring	72,858	2	4	73,903
Ships – Hoteling	11,667	<1	1	11,858
AMP Electricity Use	4,402	<1	<1	4,412
Tugboats	1,057	<1	<1	1,070
Trucks	48,181	<1	2	48,617
Line Haul Locomotives	~~148,712~~ 47,878	~~12~~ 4	~~4~~ 1	~~150,087~~ 48,320
Switch Locomotives	706	<1	<1	712

Table 3.5-3: Annual Operational GHG Emissions – NEPA Baseline (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Cargo Handling Equipment	22,206	1	<1	22,349
On-terminal Electricity Use	4,203	<1	<1	4,212
Worker Vehicles	2,790	<1	1	2,979
Total Operational Year 2033	~~316,783~~ 215,948	~~15~~ 7	~~11~~ 9	~~320,199~~ 218,432
Total Construction and Operations Year 2033				~~320,246~~ 218,479
Year 2038				
Ships - Transit and Anchoring	72,858	2	4	73,903
Ships – Hoteling	11,667	<1	1	11,858
AMP Electricity Use	4,402	<1	<1	4,412
Tugboats	1,057	<1	<1	1,070
Trucks	47,477	<1	2	47,907
Line Haul Locomotives	~~148,712~~ 47,878	~~12~~ 4	~~4~~ 1	~~150,087~~ 48,320
Switch Locomotives	706	<1	<1	712
Cargo Handling Equipment	22,206	1	<1	22,349
On-terminal Electricity Use	4,203	<1	<1	4,212
Worker Vehicles	2,648	<1	1	2,837
Total Operational Year 2038	~~315,937~~ 215,102	~~15~~ 7	~~11~~ 9	~~319,345~~ 217,580
Total Construction and Operations Year 2038				~~319,394~~ 217,627

Notes: Emissions might not add precisely because of rounding. For more explanation, refer to the discussion in Section 3.2.4.1. The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.
On-terminal electricity use includes crane operation and high mast poles.

Section 3.5.5.4, Pages 3.5-27 to 3.5-32, Table 3.5-5

Revise Table 3.5-5, as follows:

Table 3.5-5: Construction and Operational GHG Emissions without Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Amortized Construction				
Ocean Disposal				158
Upland Disposal				201

Table 3.5-5: Construction and Operational GHG Emissions without Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Year 2018				
Ships - Transit and Anchoring	51,596	1	3	52,335
Ships – Hoteling	8,417	<1	1	8,552
AMP Electricity Use	2,335	<1	<1	2,340
Tugboats	751	<1	<1	761
Trucks	51,656	<1	2	52,135
Line Haul Locomotives	~~27,833~~ 20,141	2	1	~~28,090~~ 20,327
Switch Locomotives	261	<1	<1	263
Cargo Handling Equipment	14,798	<1	<1	14,893
On-terminal Electricity Use	4,420	<1	<1	4,429
Worker Vehicles	3,412	<1	1	3,565
Total Operational Year 2018	~~163,140~~ 157,787	5	7	~~167,362~~ 159,600
With Ocean Disposal				
Total Construction and Operations Year 2018				~~167,520~~ 159,758
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~-8,556~~ -7,710
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~ 162,956
Proposed Project Minus NEPA Baseline				~~-5,469~~ -3,198
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2018				~~167,563~~ 159,801
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~-8,513~~

Table 3.5-5: Construction and Operational GHG Emissions without Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
				~~-7,667~~
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~ 162,956
Proposed Project Minus NEPA Baseline				~~-5,426~~ -3,155
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2019				
Ships - Transit and Anchoring	53,919	1	3	54,690
Ships – Hoteling	9,557	<1	1	9,707
AMP Electricity Use	2,517	<1	<1	2,523
Tugboats	793	<1	<1	802
Trucks	56,690	<1	2	57,215
Line Haul Locomotives	~~30,846~~ 20,261	~~3~~ 2	1	~~31,131~~ 20,449
Switch Locomotives	279	<1	<1	282
Cargo Handling Equipment	18,475	1	<1	18,601
On-terminal Electricity Use	4,568	<1	<1	4,578
Worker Vehicles	3,198	<1	1	3,351
Total Operational Year 2019	~~180,842~~ 170,257	~~5~~ 4	7	~~182,880~~ 172,198
With Ocean Disposal				
Total Construction and Operations Year 2019				~~183,039~~ **172,**356
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~6,962~~ 4,888
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Proposed Project Minus NEPA Baseline				~~5,603~~

Table 3.5-5: Construction and Operational GHG Emissions without Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
				~~5,531~~
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2019				~~183,082~~ 172,399
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~7,005~~ 4,931
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Proposed Project Minus NEPA Baseline				~~5,646~~ 5,574
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2026				
Ships - Transit and Anchoring	56,488	1	3	57,297
Ships – Hoteling	13,532	<1	1	13,740
AMP Electricity Use	5,310	<1	<1	5,321
Tugboats	793	<1	<1	802
Trucks	64,509	<1	2	65,094
Line Haul Locomotives	~~52,835~~ 27,759	~~4~~ 2	1	~~53,324~~ 28,015
Switch Locomotives	410	<1	<1	413
Cargo Handling Equipment	26,244	1	1	26,424
On-terminal Electricity Use	5,506	<1	<1	5,518
Worker Vehicles	3,176	<1	1	3,365
Total Operational Year 2026	~~228,802~~ 203,727	~~7~~ 5	9	~~231,297~~ 205,989
With Ocean Disposal				
Total Construction and Operations Year 2026				~~231,456~~ 206,147
CEQA Impacts				

Table 3.5-5: Construction and Operational GHG Emissions without Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~55,379~~ 38,679
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ 164,989
Proposed Project Minus NEPA Baseline				~~54,937~~ 41,158
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2026				~~231,499~~ 206,190
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~55,422~~ 38,679
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ 164,989
Proposed Project Minus NEPA Baseline				~~54,980~~ 41,989
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
Year 2033				
Ships - Transit and Anchoring	75,206	2	4	76,283
Ships – Hoteling	16,741	<1	1	17,003
AMP Electricity Use	6,201	<1	<1	6,214
Tugboats	1,057	<1	<1	1,070
Trucks	67,734	<1	2	68,345
Line Haul Locomotives	~~247,324~~ 62,105	~~20~~ 5	~~7~~ 2	~~249,609~~ 62,679

Table 3.5-5: Construction and Operational GHG Emissions without Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Switch Locomotives	924	<1	<1	932
Cargo Handling Equipment	33,878	1	1	34,111
On-terminal Electricity Use	6,426	<1	<1	6,439
Worker Vehicles	3,331	<1	1	3,555
Total Operational Year 2033	~~458,823~~ 273,603	~~24~~ 9	~~15~~ 10	~~463,561~~ 276,631
With Ocean Disposal				
Total Construction and Operations Year 2033				~~463,720~~ 276,789
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~287,643~~ 109,321
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 218,479
Proposed Project Minus NEPA Baseline				~~143,474~~ 58,310
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2033				~~463,763~~ 276,832
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~287,686~~ 109,364
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 218,479
Proposed Project Minus NEPA Baseline				~~143,517~~ 58,353

Table 3.5-5: Construction and Operational GHG Emissions without Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
Year 2038				
Ships - Transit and Anchoring	75,206	2	4	76,283
Ships – Hoteling	16,741	<1	1	17,003
AMP Electricity Use	6,201	<1	<1	6,214
Tugboats	1,057	<1	<1	1,070
Trucks	66,747	<1	2	67,351
Line Haul Locomotives	~~247,324~~ 62,105	~~20~~ 5	~~7~~ 2	~~249,609~~ 62,679
Switch Locomotives	924	<1	<1	932
Cargo Handling Equipment	33,878	1	1	34,111
On-terminal Electricity Use	6,426	<1	<1	6,439
Worker Vehicles	3,162	<1	1	3,386
Total Operational Year 2038	~~457,666~~ 272,447	~~24~~ 9	~~15~~ 10	~~462,398~~ 275,468
With Ocean Disposal				
Total Construction and Operations Year 2038				~~462,556~~ 275,468
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~286,480~~ 108,158
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Proposed Project Minus NEPA Baseline				~~143,161~~ 57,999
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2038				~~462,599~~ **275,669**
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~

Table 3.5-5: Construction and Operational GHG Emissions without Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
				167,468
Proposed Project Minus CEQA Baseline				~~286,523~~ **108,201**
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Proposed Project Minus NEPA Baseline				~~143,204~~ 58,042
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes

Notes:

Emissions might not add precisely because of rounding. For more explanation, refer to the discussion in Section 3.2.4.1. The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

Construction emissions are amortized over the life of the proposed Project (30 years) and added to each year of operational emissions.

On-terminal electricity use includes crane operation and high mast poles.

Section 3.5.5.4, Page 3.5-33

Revise lease measure LM GHG-1, as follows:

LM GHG-1: GHG Credit Fund. Proposed Project GHG emissions are ~~278,708~~99,812 metric tons of CO2e above the CEQA Baseline in the peak year of operations in 2038. They exceed the 10,000 metric ton CO2e significance threshold by ~~268,708~~99,856 metric tons. Because operational GHG emissions exceed the significance threshold with the incorporation of all feasible mitigation measures, LAHD shall establish a carbon offset fund, which may be accomplished through a Memorandum of Understanding with the California Air Resources Board or another appropriate entity, to mitigate project GHG impacts to the maximum extent feasible. The fund shall be used for GHG-reducing projects and programs on Port of Los Angeles property. It shall be the responsibility of the Tenant to contribute to the fund. Fund contribution shall be the equivalent of 1 percent of the minimum annual guarantee (MAG) at the time that project construction will commence. This amount will be approximately $300,000~~$250,000~~, payable upon substantial completion of Project construction. This amount is appropriate because it takes into account the tenant's actual container throughput and assesses a fee in correlation with the facility's GHG ~~$250,000 has been identified as the maximum feasible~~ contribution level. ~~taking into account the cost of the~~

~~proposed Project, including on-site GHG-reducing mitigation measures that the tenant will be required to implement (LED high mast lighting and solar panels over the employee parking lot). I~~If LAHD is unable to establish the fund within a reasonable period of time, the Tenant shall instead purchase credits from an approved GHG offset registry in the amount of approximately $300,000~~$250,000~~.

Section 3.5.5.4, Pages 3.5-36 to 3.5-41, Table 3.5-7

Revise Table 3.5-7, as follows:

Table 3.5-7: Construction and Operational GHG Emissions with Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Amortized Construction				
Ocean Disposal				159
Upland Disposal				203
Year 2018				
Ships - Transit and Anchoring	51,596	1	3	52,335
Ships – Hoteling	8,417	<1	1	8,552
AMP Electricity Use	2,335	<1	<1	2,340
Tugboats	751	<1	<1	761
Trucks	51,656	<1	2	52,135
Line Haul Locomotives	~~27,833~~ 20,141	2	1	~~28,090~~ 20,327
Switch Locomotives	261	<1	<1	263
Cargo Handling Equipment	14,798	<1	<1	14,893
On-terminal Electricity Use	4,420	<1	<1	4,429
Worker Vehicles	3,412	<1	1	3,565
Total Operational Year 2018	~~163,140~~ 157,787	5	7	~~167,362~~ 159,600
With Ocean Disposal				
Total Construction and Operations Year 2018				~~167,521~~ 159,759
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~-8,556~~ -7,709
Significance Threshold				10,000
Significant?				No
NEPA Impacts				

Table 3.5-7: Construction and Operational GHG Emissions with Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
NEPA Baseline Emissions				~~172,989~~ 162,956
Proposed Project Minus NEPA Baseline				~~-5,469~~ -3,197
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2018				~~167,564~~ 159,803
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~-8,512~~ -7,665
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~ 162,956
Proposed Project Minus NEPA Baseline				~~-5,425~~ -3,153
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2019				
Ships - Transit and Anchoring	53,398	1	3	54,163
Ships – Hoteling	9,408	<1	1	9,556
AMP Electricity Use	2,682	<1	<1	2,687
Tugboats	793	<1	<1	802
Trucks	56,690	<1	2	57,215
Line Haul Locomotives	~~30,846~~ 20,261	~~3~~ 2	1	~~31,131~~ 20,449
Switch Locomotives	279	<1	<1	282
Cargo Handling Equipment	18,475	1	<1	18,601
On-terminal Electricity Use	3,311	<1	<1	3,318
Worker Vehicles	3,198	<1	1	3,351
Total Operational Year 2019	~~179,079~~ 168,495	~~5~~ 4	7	~~181,107~~ 170,424

Table 3.5-7: Construction and Operational GHG Emissions with Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
With Ocean Disposal				
Total Construction and Operations Year 2019				~~181,266~~ 170,583
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~5,190~~ 3,115
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Proposed Project Minus NEPA Baseline				~~3,831~~ 3,758
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2019				~~181,310~~ 170,627
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~5,233~~ 3,159
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Proposed Project Minus NEPA Baseline				~~3,874~~ 3,802
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2026				
Ships - Transit and Anchoring	55,974	1	3	56,777
Ships – Hoteling	12,292	<1	1	12,487
AMP Electricity Use	6,291	<1	<1	6,304

Table 3.5-7: Construction and Operational GHG Emissions with Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Tugboats	793	<1	<1	802
Trucks	64,509	<1	2	65,094
Line Haul Locomotives	~~52,835~~ 27,759	~~4~~ 2	1	~~53,324~~ 28,015
Switch Locomotives	410	<1	<1	413
Cargo Handling Equipment	26,244	1	1	26,424
On-terminal Electricity Use	4,248	<1	<1	4,257
Worker Vehicles	3,176	<1	1	3,365
Total Operational Year 2026	~~226,772~~ 201,696	~~7~~ 5	9	~~229,247~~ 203,938
With Ocean Disposal				
Total Construction and Operations Year 2026				~~229,406~~ 204,097
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~53,330~~ 36,629
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ **164,989**
Proposed Project Minus NEPA Baseline				~~52,887~~ **39,108**
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2026				~~229,449~~ 204,141
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~53,373~~ 36,673
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				

Table 3.5-7: Construction and Operational GHG Emissions with Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
NEPA Baseline Emissions				~~176,519~~ 164,989
Proposed Project Minus NEPA Baseline				~~52,930~~ 39,152
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
Year 2033				
Ships - Transit and Anchoring	74,454	2	4	75,522
Ships – Hoteling	15,316	<1	1	15,561
AMP Electricity Use	7,344	<1	<1	7,359
Tugboats	1,057	<1	<1	1,070
Trucks	67,734	<1	2	68,345
Line Haul Locomotives	~~247,324~~ 62,105	~~20~~ 5	~~7~~ 2	~~249,609~~ 62,679
Switch Locomotives	924	<1	<1	932
Cargo Handling Equipment	33,878	1	1	34,111
On-terminal Electricity Use	5,168	<1	<1	5,179
Worker Vehicles	3,331	<1	1	3,555
Total Operational Year 2033	~~456,531~~ 271,311	~~24~~ 9	~~15~~ 10	~~461,244~~ 274,313
With Ocean Disposal				
Total Construction and Operations Year 2033				~~461,403~~ 274,472
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~285,327~~ 107,004
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 218,479
Proposed Project Minus NEPA Baseline				~~141,157~~ 55,993
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				

Table 3.5-7: Construction and Operational GHG Emissions with Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Total Construction and Operations Year 2033				~~461,447~~ 274,516
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~285,370~~ 107,048
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 218,479
Proposed Project Minus NEPA Baseline				~~141,201~~ 56,037
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
Year 2038				
Ships - Transit and Anchoring	69,260	2	4	70,327
Ships – Hoteling	15,056	<1	1	15,301
AMP Electricity Use	7,344	<1	<1	7,359
Tugboats	1,057	<1	<1	1,070
Trucks	66,747	<1	2	67,351
Line Haul Locomotives	~~247,324~~ 62,105	~~20~~ 5	~~7~~ 2	~~249,609~~ 62,105
Switch Locomotives	924	<1	<1	932
Cargo Handling Equipment	33,878	1	1	34,111
On-terminal Electricity Use	5,168	<1	<1	5,179
Worker Vehicles	3,162	<1	1	3,386
Total Operational Year 2038	~~449,919~~ 264,701	~~24~~ 9	~~15~~ 10	~~454,626~~ 267,121
With Ocean Disposal				
Total Construction and Operations Year 2038				~~454,784~~ 267,280
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~278,708~~ 99,812

Table 3.5-7: Construction and Operational GHG Emissions with Mitigation – Proposed Project (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Proposed Project Minus NEPA Baseline				~~135,390~~ 49,653
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2038				~~454,828~~ 267,324
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Proposed Project Minus CEQA Baseline				~~278,752~~ 99,856
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Proposed Project Minus NEPA Baseline				~~135,434~~ 49,697
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes

Notes:

Emissions might not add precisely because of rounding. For more explanation, refer to the discussion in Section 3.2.4.1. The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

Construction emissions are amortized over the life of the proposed Project (30 years) and added to each year of operational emissions.

On-terminal electricity use includes crane operation and high mast poles.

Section 3.5.5.4, Pages 3.5-53 to 3.5-56, Table 3.5-10

Revise Table 3.5-10, as follows:

Table 3.5-10: Construction and Operational GHG Emissions without Mitigation – Alternative 1 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Amortized Construction				47
Year 2018				
Ships - Transit and Anchoring	53,821	1	3	54,591
Ships – Hoteling	8,780	<1	1	8,921
AMP Electricity Use	2,436	<1	<1	2,441
Tugboats	784	<1	<1	793
Trucks	51,656	<1	2	52,135
Line Haul Locomotives	~~30,064~~ 20,123	2	1	~~30,342~~ 20,309
Switch Locomotives	272	<1	<1	274
Cargo Handling Equipment	15,262	<1	<1	15,361
On-terminal Electricity Use	4,509	<1	<1	4,519
Worker Vehicles	3,412	<1	1	3,565
Total Operational Year 2018	~~170,996~~ 161,055	5	7	~~172,942~~ 162,909
Total Construction and Operations Year 2018				~~172,989~~ 162,956
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 1 Minus CEQA Baseline				~~-3,087~~ -4,512
Significance Threshold				10,000
Significant?				No
Year 2019				

Table 3.5-10: Construction and Operational GHG Emissions without Mitigation – Alternative 1 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Ships - Transit and Anchoring	54,433	1	3	55,212
Ships – Hoteling	8,880	<1	1	9,022
AMP Electricity Use	2,464	<1	<1	2,469
Tugboats	793	<1	<1	802
Trucks	56,315	<1	2	56,836
Line Haul Locomotives	~~30,693~~ 20,181	2	1	~~30,977~~ 20,367
Switch Locomotives	275	<1	<1	277
Cargo Handling Equipment	15,611	1	<1	15,712
On-terminal Electricity Use	4,534	<1	<1	4,544
Worker Vehicles	3,176	<1	1	3,329
Total Operational Year 2019	~~177,173~~ 166,662	5	7	~~179,179~~ 168,570
Total Construction and Operations Year 2019				~~179,226~~ 168,617
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 1 Minus CEQA Baseline				~~3,150~~ 1,149
Significance Threshold				10,000
Significant?				No
Year 2026				

Table 3.5-10: Construction and Operational GHG Emissions without Mitigation – Alternative 1 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Ships - Transit and Anchoring	55,448	1	3	56,242
Ships – Hoteling	9,074	<1	1	9,219
AMP Electricity Use	2,545	<1	<1	2,550
Tugboats	793	<1	<1	802
Trucks	50,297	<1	2	50,753
Line Haul Locomotives	~~32,958~~ 21,533	~~3~~ 2	1	~~33,263~~ 21,732
Switch Locomotives	318	<1	<1	321
Cargo Handling Equipment	17,464	1	<1	17,577
On-terminal Electricity Use	4,794	<1	<1	4,804
Worker Vehicles	2,703	<1	1	2,865
Total Operational Year 2026	~~176,394~~ 164,969	~~5~~ 4	7	~~178,397~~ 166,865
Total Construction and Operations Year 2026				~~178,443~~ 166,912
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 1 Minus CEQA Baseline				~~2,367~~ -556
Significance Threshold				10,000
Significant?				No
Year 2033				

Table 3.5-10: Construction and Operational GHG Emissions without Mitigation – Alternative 1 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Ships - Transit and Anchoring	73,567	2	4	74,621
Ships – Hoteling	12,535	<1	1	12,736
AMP Electricity Use	3,698	<1	<1	3,706
Tugboats	1,057	<1	<1	1,070
Trucks	48,181	<1	2	48,617
Line Haul Locomotives	~~148,712~~ 47,878	~~12~~ 4	~~4~~ 1	~~150,087~~ 48,320
Switch Locomotives	706	<1	<1	712
Cargo Handling Equipment	22,206	1	<1	22,349
On-terminal Electricity Use	5,461	<1	<1	5,472
Worker Vehicles	2,790	<1	1	2,979
Total Operational Year 2033	~~318,915~~ 218,079	~~15~~ 7	~~11~~ 8	~~322,350~~ 220,582
Total Construction and Operations Year 2033				~~322,396~~ 220,629
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 1 Minus CEQA Baseline				~~146,320~~ 53,161
Significance Threshold				10,000
Significant?				Yes
Year 2038				

Table 3.5-10: Construction and Operational GHG Emissions without Mitigation – Alternative 1 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Ships - Transit and Anchoring	73,567	2	4	74,621
Ships – Hoteling	12,535	<1	1	12,736
AMP Electricity Use	3,698	<1	<1	3,706
Tugboats	1,057	<1	<1	1,070
Trucks	47,477	<1	2	47,907
Line Haul Locomotives	~~148,712~~ 47,878	~~12~~ 4	~~4~~ 1	~~150,087~~ 48,320
Switch Locomotives	706	<1	<1	712
Cargo Handling Equipment	22,206	1	<1	22,349
On-terminal Electricity Use	5,461	<1	<1	5,472
Worker Vehicles	2,648	<1	1	2,837
Total Operational Year 2038	~~318,068~~ 217,233	~~15~~ 7	~~11~~ 8	~~321,498~~ 219,730
Total Construction and Operations Year 2038				~~321,545~~ 219,777
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 1 Minus CEQA Baseline				~~145,468~~ 52,309
Significance Threshold				10,000
Significant?				Yes

Notes:
Alternative 1 is the same as the NEPA baseline; amortized construction emissions are the same as those presented for the NEPA baseline in Section 3.5.5.2, per Table 3.5-2.
Emissions might not add precisely because of rounding. For more explanation, refer to the discussion in Section 3.2.4.1. The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.
Construction emissions are amortized over the life of the proposed Project (30 years) and added to each year of operational emissions.
On-terminal electricity use includes crane operation and high mast poles.

Section 3.5.5.4, Pages 3.5-56 to 3.5-59, Table 3.5-11

Revise Table 3.5-11, as follows:

Table 3.5-11: Construction and Operational GHG Emissions with Mitigation – Alternative 1 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Amortized Construction				47
Year 2018				
Ships - Transit and Anchoring	53,821	1	3	54,591
Ships – Hoteling	8,780	<1	1	8,921
AMP Electricity Use	2,436	<1	<1	2,441
Tugboats	784	<1	<1	793
Trucks	51,656	<1	2	52,135
Line Haul Locomotives	~~30,064~~ 20,123	2	1	~~30,342~~ 20,309
Switch Locomotives	272	<1	<1	274
Cargo Handling Equipment	15,262	<1	<1	15,361
On-terminal Electricity Use	4,509	<1	<1	4,519
Worker Vehicles	3,412	<1	1	3,565
Total Operational Year 2018	~~170,996~~ 161,055	5	7	~~172,942~~ 162,909
Total Construction and Operations Year 2018				~~172,989~~ 162,956
CEQA Impacts				
CEQA Baseline Emissions				~~176,075~~ 167,468
Alternative 1 Minus CEQA Baseline				~~-3,088~~ -4,512
Significance Threshold				10,000
Significant?				No
Year 2019				
Ships - Transit and Anchoring	53,906	1	3	54,679
Ships – Hoteling	8,707	<1	1	8,848
AMP Electricity Use	2,639	<1	<1	2,645
Tugboats	793	<1	<1	802
Trucks	56,315	<1	2	56,836
Line Haul Locomotives	~~30,693~~ 20,181	2	1	~~30,977~~ 20,367
Switch Locomotives	275	<1	<1	277
Cargo Handling Equipment	15,611	1	<1	15,712
On-terminal Electricity Use	3,276	<1	<1	3,283
Worker Vehicles	3,176	<1	1	3,329
Total Operational Year 2019	~~175,392~~ 164,879	5	7	~~177,388~~ 166,778
Total Construction and Operations Year 2019				~~177,435~~ 166,825

Table 3.5-11: Construction and Operational GHG Emissions with Mitigation – Alternative 1 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 1 Minus CEQA Baseline				~~1,359~~ -643
Significance Threshold				10,000
Significant?				No
Year 2026				
Ships - Transit and Anchoring	54,909	1	3	55,697
Ships – Hoteling	8,460	<1	1	8,599
AMP Electricity Use	3,046	<1	<1	3,052
Tugboats	793	<1	<1	802
Trucks	50,297	<1	2	50,753
Line Haul Locomotives	~~32,958~~ 21,533	~~3~~ 2	1	~~33,263~~ 21,732
Switch Locomotives	318	<1	<1	321
Cargo Handling Equipment	17,464	1	<1	17,577
On-terminal Electricity Use	3,536	<1	<1	3,544
Worker Vehicles	2,703	<1	1	2,865
Total Operational Year 2026	~~174,484~~ 163,059	~~5~~ 4	7	~~176,472~~ 164,942
Total Construction and Operations Year 2026				~~176,519~~ 164,989
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 1 Minus CEQA Baseline				~~443~~ -2,479
Significance Threshold				10,000
Significant?				No
Year 2033				
Ships - Transit and Anchoring	72,858	2	4	73,903
Ships – Hoteling	11,667	<1	1	11,858
AMP Electricity Use	4,402	<1	<1	4,412
Tugboats	1,057	<1	<1	1,070
Trucks	48,181	<1	2	48,617
Line Haul Locomotives	~~148,712~~ 47,878	~~12~~ 4	~~4~~ 1	~~150,087~~ 48,320
Switch Locomotives	706	<1	<1	712
Cargo Handling Equipment	22,206	1	<1	22,349

Table 3.5-11: Construction and Operational GHG Emissions with Mitigation – Alternative 1 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
On-terminal Electricity Use	4,203	<1	<1	4,212
Worker Vehicles	2,790	<1	1	2,979
Total Operational Year 2033	~~316,783~~ 215,948	~~15~~ 7	~~11~~ 8	~~320,199~~ 218,432
Total Construction and Operations Year 2033				~~320,246~~ 218,479
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 1 Minus CEQA Baseline				~~144,170~~ 51,011
Significance Threshold				10,000
Significant?				Yes
Year 2038				
Ships - Transit and Anchoring	72,858	2	4	73,903
Ships – Hoteling	11,667	<1	1	11,858
AMP Electricity Use	4,402	<1	<1	4,412
Tugboats	1,057	<1	<1	1,070
Trucks	47,477	<1	2	47,907
Line Haul Locomotives	~~148,712~~ 47,878	~~12~~ 4	~~4~~ 1	~~150,087~~ 48,320
Switch Locomotives	706	<1	<1	712
Cargo Handling Equipment	22,206	1	<1	22,349
On-terminal Electricity Use	4,203	<1	<1	4,212
Worker Vehicles	2,648	<1	1	2,837
Total Operational Year 2038	~~315,937~~ 215,102	~~15~~ 7	~~11~~ 8	~~319,348~~ 217,580
Total Construction and Operations Year 2038				~~319,394~~ 217,627
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 1 Minus CEQA Baseline				~~143,318~~ 50,159
Significance Threshold				10,000
Significant?				Yes

Notes:

Alternative 1 is the same as the NEPA baseline; amortized construction emissions are the same as those presented for the NEPA baseline in Section 3.5.5.2, per Table 3.5-2.

Emissions might not add precisely because of rounding. For more explanation, refer to the discussion in Section 3.2.4.1. The emission estimates presented in this table were calculated using the latest available data,

Table 3.5-11: Construction and Operational GHG Emissions with Mitigation – Alternative 1 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e

assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

Construction emissions are amortized over the life of the proposed Project (30 years) and added to each year of operational emissions.

On-terminal electricity use includes crane operation and high mast poles.

Section 3.5.5.4, Pages 3.5-60 to 3.5-62, Table 3.5-12

Revise Table 3.5-12, as follows:

Table 3.5-12: Operational GHG Emissions – Alternative 2 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Year 2018				
Ships - Transit and Anchoring	53,821	1	3	54,591
Ships – Hoteling	8,780	<1	1	8,921
AMP Electricity Use	2,436	<1	<1	2,441
Tugboats	784	<1	<1	793
Trucks	51,656	<1	2	52,135
Line Haul Locomotives	~~30,064~~ 20,123	2	1	~~30,342~~ 20,309
Switch Locomotives	272	<1	<1	274
Cargo Handling Equipment	15,262	1	<1	15,361
On-terminal Electricity Use	4,509	<1	<1	4,519
Worker Vehicles	3,412	<1	1	3,565
Total Operational Year 2018	~~170,996~~ 161,055	5	7	~~172,942~~ 162,909
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 2 Minus CEQA Baseline				~~-3,134~~ -4,559
Significance Threshold				10,000
Significant?				No
Year 2019				
Ships - Transit and Anchoring	54,433	1	3	55,212
Ships – Hoteling	8,880	<1	1	9,022
AMP Electricity Use	2,464	<1	<1	2,469
Tugboats	793	<1	<1	802
Trucks	56,315	<1	1	56,836
Line Haul Locomotives	~~30,693~~ 20,181	2	1	~~30,977~~ 20,367

Table 3.5-12: Operational GHG Emissions – Alternative 2 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Switch Locomotives	275	<1	<1	277
Cargo Handling Equipment	15,611	1	<1	15,712
On-terminal Electricity Use	4,534	<1	<1	4,544
Worker Vehicles	3,176	<1	1	3,329
Total Operational Year 2019	~~177,173~~ 166,662	5	7	~~179,179~~ 168,570
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 2 Minus CEQA Baseline				~~3,103~~ 1,102
Significance Threshold				10,000
Significant?				No
Year 2026				
Ships - Transit and Anchoring	55,448	1	3	56,242
Ships – Hoteling	9,074	<1	1	9,219
AMP Electricity Use	2,545	<1	<1	2,550
Tugboats	793	<1	<1	802
Trucks	50,297	<1	2	50,753
Line Haul Locomotives	~~32,958~~ 21,533	~~3~~ 2	1	~~33,263~~ 21,732
Switch Locomotives	318	<1	<1	321
Cargo Handling Equipment	17,464	1	<1	17,577
On-terminal Electricity Use	4,794	<1	<1	4,804
Worker Vehicles	2,703	<1	1	2,865
Total Operational Year 2026	~~176,394~~ 164,969	~~5~~ 4	7	~~178,397~~ 166,865
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 2 Minus CEQA Baseline				~~2,320~~ -603
Significance Threshold				10,000
Significant?				No
Year 2033				
Ships - Transit and Anchoring	73,567	2	4	74,621
Ships – Hoteling	12,535	<1	1	12,736
AMP Electricity Use	3,698	<1	<1	3,706
Tugboats	1,057	<1	<1	1,070
Trucks	48,181	<1	2	48,617
Line Haul Locomotives	~~148,712~~	~~12~~	~~4~~	~~150,087~~

Table 3.5-12: Operational GHG Emissions – Alternative 2 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
	47,878	4	1	48,320
Switch Locomotives	706	<1	<1	712
Cargo Handling Equipment	22,206	1	<1	22,349
On-terminal Electricity Use	5,461	<1	<1	5,472
Worker Vehicles	2,790	<1	1	2,979
Total Operational Year 2033	~~318,915~~ 218,079	~~15~~ 7	~~11~~ 8	~~322,350~~ 220,582
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 2 Minus CEQA Baseline				~~146,274~~ 53,114
Significance Threshold				10,000
Significant?				Yes
Year 2038				
Ships - Transit and Anchoring	73,567	2	4	74,621
Ships – Hoteling	12,535	<1	1	12,736
AMP Electricity Use	3,698	<1	<1	3,706
Tugboats	1,057	<1	<1	1,070
Trucks	47,477	<1	2	47,907
Line Haul Locomotives	~~148,712~~ 47,878	~~12~~ 4	~~4~~ 1	~~150,087~~ 48,320
Switch Locomotives	706	<1	<1	712
Cargo Handling Equipment	22,206	1	<1	22,349
On-terminal Electricity Use	5,461	<1	<1	5,472
Worker Vehicles	2,648	<1	1	2,837
Total Operational Year 2038	~~318,068~~ 217,233	~~15~~ 7	~~11~~ 8	~~321,498~~ 219,730
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 2 Minus CEQA Baseline				~~145,422~~ 52,262
Significance Threshold				10,000
Significant?				Yes

Notes:

Emissions might not add precisely because of rounding. For more explanation, refer to the discussion in Section 3.2.4.1. The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

On-terminal electricity use includes crane operation and high mast poles.

Section 3.5.5.4, Pages 3.5-65 to 3.5-70, Table 3.5-14

Revise Table 3.5-14, as follows:

Table 3.5-14: Construction and Operational GHG Emissions without Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Amortized Construction				
Ocean Disposal				137
Upland Disposal				167
Year 2018				
Ships - Transit and Anchoring	51,596	1	3	52,335
Ships – Hoteling	8,417	<1	1	8,552
AMP Electricity Use	2,335	<1	<1	2,340
Tugboats	751	<1	<1	761
Trucks	51,656	<1	2	52,135
Line Haul Locomotives	~~27,833~~ 19,746	2	1	~~28,090~~ 19,929
Switch Locomotives	261	<1	<1	263
Cargo Handling Equipment	14,798	<1	<1	14,893
On-terminal Electricity Use	2,082	<1	<1	2,091
Worker Vehicles	3,412	<1	1	3,565
Total Operational Year 2018	~~163,140~~ 155,054	5	7	~~165,024~~ 156,864
With Ocean Disposal				
Total Construction and Operations Year 2018				~~165,160~~ 157,001
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~-10,916~~ -10,467
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~ 162,956
Alternative 3 Minus NEPA Baseline				~~-7,829~~ -5,955
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				

Table 3.5-14: Construction and Operational GHG Emissions without Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Total Construction and Operations Year 2018				~~165,191~~ 157,031
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~-10,886~~ -10,437
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~ 162,956
Alternative 3 Minus NEPA Baseline				~~-7,799~~ -5,925
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2019				
Ships - Transit and Anchoring	49,182	1	3	49,889
Ships – Hoteling	9,575	<1	1	9,728
AMP Electricity Use	2,411	<1	<1	2,416
Tugboats	793	<1	<1	802
Trucks	55,131	<1	2	55,642
Line Haul Locomotives	~~29,341~~ **19,254**	~~3~~ 2	1	~~29,612~~ 19,432
Switch Locomotives	272	<1	<1	274
Cargo Handling Equipment	17,059	1	<1	17,173
On-terminal Electricity Use	4,509	<1	<1	4,519
Worker Vehicles	3,151	<1	1	3,303
Total Operational Year 2019	~~171,424~~ **161,337**	~~5~~ 4	7	~~173,357~~ 163,178
With Ocean Disposal				
Total Construction and Operations Year 2019				~~173,494~~ **163,315**
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ **167,468**
Alternative 3 Minus CEQA Baseline				~~-2,583~~ -4,153

Table 3.5-14: Construction and Operational GHG Emissions without Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Alternative 3 Minus NEPA Baseline				~~-3,942~~ -3,510
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2019				~~173,524~~ 163,345
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~-2,552~~ -4,123
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Alternative Minus NEPA Baseline				~~-3,912~~ -3,480
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2026				
Ships - Transit and Anchoring	51,047	1	3	51,780
Ships – Hoteling	12,045	<1	1	12,232
AMP Electricity Use	4,920	<1	<1	4,930
Tugboats	793	<1	<1	802
Trucks	61,173	<1	2	61,727
Line Haul Locomotives	~~47,895~~ 26,339	~~4~~ 2	1	~~48,337~~ 26,583
Switch Locomotives	389	<1	<1	392
Cargo Handling Equipment	23,604	1	1	23,763
On-terminal Electricity Use	5,343	<1	<1	5,354
Worker Vehicles	3,066	<1	1	3,248

Table 3.5-14: Construction and Operational GHG Emissions without Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Total Operational Year 2026	~~210,274~~ 188,719	~~7~~ 5	8	~~212,567~~ 190,811
With Ocean Disposal				
Total Construction and Operations Year 2026				~~212,704~~ 190,948
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~36,628~~ 23,480
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ 164,989
Alternative 3 Minus NEPA Baseline				~~36,185~~ 25,959
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2026				~~212,734~~ 190,978
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~36,658~~ 23,510
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ 164,989
Alternative 3 Minus NEPA Baseline				~~36,215~~ 25,989
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
Year 2033				
Ships - Transit and Anchoring	68,912	2	4	69,901
Ships – Hoteling	15,094	<1	1	15,328

Table 3.5-14: Construction and Operational GHG Emissions without Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
AMP Electricity Use	5,728	<1	<1	5,740
Tugboats	1,057	<1	<1	1,070
Trucks	63,246	<1	2	63,817
Line Haul Locomotives	~~222,374~~ 58,824	~~18~~ 5	~~6~~ 2	~~224,429~~ 59,367
Switch Locomotives	874	<1	<1	882
Cargo Handling Equipment	30,365	1	1	30,570
On-terminal Electricity Use	6,204	<1	<1	6,217
Worker Vehicles	3,213	<1	1	3,429
Total Operational Year 2033	~~417,067~~ 253,517	~~22~~ 9	~~14~~ 10	~~421,383~~ 256,321
With Ocean Disposal				
Total Construction and Operations Year 2033				~~421,520~~ 256,458
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~245,444~~ 88,990
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 218,479
Alternative 3 Minus NEPA Baseline				~~101,274~~ 37,979
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2033				~~421,550~~ 256,488
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~245,474~~ 89,020
Significance Threshold				10,000
Significant?				Yes

Table 3.5-14: Construction and Operational GHG Emissions without Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 218,479
Alternative 3 Minus NEPA Baseline				~~101,304~~ 38,009
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
Year 2038				
Ships - Transit and Anchoring	68,912	2	4	69,901
Ships – Hoteling	15,094	<1	1	15,328
AMP Electricity Use	5,728	<1	<1	5,740
Tugboats	1,057	<1	<1	1,070
Trucks	62,324	<1	2	62,888
Line Haul Locomotives	~~222,374~~ 58,824	~~18~~ 5	~~6~~ 2	~~224,429~~ 59,367
Switch Locomotives	874	<1	<1	882
Cargo Handling Equipment	30,365	1	1	30,570
On-terminal Electricity Use	6,204	<1	<1	6,217
Worker Vehicles	3,049	<1	1	3,266
Total Operational Year 2038	~~415,982~~ 252,431	~~22~~ 9	~~14~~ 10	~~420,291~~ 255,229
With Ocean Disposal				
Total Construction and Operations Year 2038				~~420,428~~ 255,366
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~244,351~~ 87,898
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Alternative 3 Minus NEPA Baseline				~~101,033~~ 37,739
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes

Table 3.5-14: Construction and Operational GHG Emissions without Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
With Upland Disposal				
Total Construction and Operations Year 2038				~~420,458~~ 255,396
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~244,381~~ 87,928
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Alternative 3 Minus NEPA Baseline				~~101,063~~ 37,769
Significance Threshold				25,000
Significant?				Yes

Section 3.5.5.4, Pages 3.5-71 to 3.5-77, Table 3.5-16

Revise Table 3.5-16, as follows:

Table 3.5-16: Construction and Operational GHG Emissions with Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Amortized Construction				
Ocean Disposal				137
Upland Disposal				168
Year 2018				
Ships - Transit and Anchoring	51,596	1	3	52,335
Ships - Hoteling	8,417	<1	1	8,552
AMP Electricity Use	2,335	<1	<1	2,340
Tugboats	751	<1	<1	761
Trucks	51,656	<1	2	52,135
Line Haul Locomotives	~~27,833~~ 19,746	2	1	~~28,090~~ 19,929
Switch Locomotives	261	<1	<1	263

Table 3.5-16: Construction and Operational GHG Emissions with Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Cargo Handling Equipment	14,798	<1	<1	14,893
On-terminal Electricity Use	2,082	<1	<1	2,091
Worker Vehicles	3,412	<1	1	3,565
Total Operational Year 2018	~~163,140~~ 155,054	5	7	~~165,024~~ 156,864
With Ocean Disposal				
Total Construction and Operations Year 2018				~~165,161~~ 157,001
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~-10,915~~ -10,467
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~ 162,956
Alternative 3 Minus NEPA Baseline				~~-7,828~~ -5,955
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2018				~~165,192~~ 157,032
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~-10,885~~ -10,436
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~ 162,956
Alternative 3 Minus NEPA Baseline				~~-7,798~~ -5,924
CEQ Reference Level				25,000

Table 3.5-16: Construction and Operational GHG Emissions with Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Exceeds CEQ Reference Level?				No
Year 2019				
Ships - Transit and Anchoring	48,704	1	3	49,405
Ships - Hoteling	9,426	<1	1	9,577
AMP Electricity Use	2,571	<1	<1	2,576
Tugboats	793	<1	<1	802
Trucks	55,131	<1	2	55,642
Line Haul Locomotives	~~29,341~~ 19,254	~~3~~ 2	1	~~29,612~~ 19,432
Switch Locomotives	272	<1	<1	274
Cargo Handling Equipment	17,059	1	<1	17,173
On-terminal Electricity Use	3,252	<1	<1	3,258
Worker Vehicles	3,151	<1	1	3,303
Total Operational Year 2019	~~169,699~~ 159,613	~~5~~ 4	7	~~171,623~~ 161,442
With Ocean Disposal				
Total Construction and Operations Year 2019				~~171,760~~ 161,579
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~-4,316~~ -5,889
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Alternative 3 Minus NEPA Baseline				~~-5,675~~ -5,246
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2019				~~171,791~~ 161,610
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468

Table 3.5-16: Construction and Operational GHG Emissions with Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Alternative 3 Minus CEQA Baseline				~~-4,285~~ -5,858
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Alternative 3 Minus NEPA Baseline				~~-5,644~~ -5,215
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2026				
Ships - Transit and Anchoring	50,547	1	3	51,275
Ships - Hoteling	10,907	<1	1	11,081
AMP Electricity Use	5,820	<1	<1	5,833
Tugboats	793	<1	<1	802
Trucks	61,173	<1	2	61,727
Line Haul Locomotives	~~47,895~~ 26,339	~~4~~ 2	1	~~48,337~~ 26,583
Switch Locomotives	389	<1	<1	392
Cargo Handling Equipment	23,604	1	1	23,763
On-terminal Electricity Use	4,085	<1	<1	4,094
Worker Vehicles	3,066	<1	1	3,248
Total Operational Year 2026	~~208,279~~ 186,723	~~7~~ 5	8	~~210,553~~ 188,798
With Ocean Disposal				
Total Construction and Operations Year 2026				~~210,690~~ 188,935
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~34,614~~ 21,467
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ 164,989

Table 3.5-16: Construction and Operational GHG Emissions with Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Alternative 3 Minus NEPA Baseline				~~34,171~~ 23,946
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2026				~~210,721~~ 188,966
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~34,645~~ 21,498
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ 164,989
Alternative 3 Minus NEPA Baseline				~~34,202~~ 23,977
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
Year 2033				
Ships - Transit and Anchoring	68,173	2	4	69,153
Ships - Hoteling	13,786	<1	1	14,006
AMP Electricity Use	6,773	<1	<1	6,788
Tugboats	1,057	<1	<1	1,070
Trucks	63,246	<1	2	63,817
Line Haul Locomotives	~~222,374~~ 58,824	~~18~~ 5	~~6~~ 2	~~224,429~~ 59,367
Switch Locomotives	874	<1	<1	882
Cargo Handling Equipment	30,365	1	1	30,570
On-terminal Electricity Use	4,946	<1	<1	4,957
Worker Vehicles	3,213	<1	1	3,429
Total Operational Year 2033	~~414,808~~ 251,257	~~22~~ 9	~~14~~ 10	~~419,100~~ 254,039
With Ocean Disposal				
Total Construction and Operations Year 2033				~~419,237~~ 254,176

Table 3.5-16: Construction and Operational GHG Emissions with Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~243,161~~ 86,708
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 218,479
Alternative 3 Minus NEPA Baseline				~~98,991~~ 35,697
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2033				~~419,268~~ 254,207
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~243,191~~ 86,739
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 218,479
Alternative 3 Minus NEPA Baseline				~~99,022~~ 35,728
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
Year 2038				
Ships - Transit and Anchoring	68,173	2	4	69,153
Ships - Hoteling	13,786	<1	1	14,006
AMP Electricity Use	6,773	<1	<1	6,788
Tugboats	1,057	<1	<1	1,070
Trucks	62,324	<1	2	62,888
Line Haul Locomotives	~~222,374~~	~~18~~	~~6~~	~~224,429~~

Table 3.5-16: Construction and Operational GHG Emissions with Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
	58,824	5	2	59,367
Switch Locomotives	874	<1	<1	882
Cargo Handling Equipment	30,365	1	1	30,570
On-terminal Electricity Use	4,946	<1	<1	4,957
Worker Vehicles	3,049	<1	1	3,266
Total Operational Year 2038	~~413,722~~ 250,171	~~21~~ 8	~~14~~ 10	~~418,007~~ 252,947
With Ocean Disposal				
Total Construction and Operations Year 2038				~~418,145~~ 253,084
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~242,068~~ 85,616
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Alternative 3 Minus NEPA Baseline				~~98,750~~ 35,457
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2038				~~418,175~~ 253,115
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 3 Minus CEQA Baseline				~~242,099~~ 85,647
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Alternative 3 Minus NEPA Baseline				~~98,781~~

Table 3.5-16: Construction and Operational GHG Emissions with Mitigation – Alternative 3 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
				35,488
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes

Notes:

Emissions might not add precisely because of rounding. For more explanation, refer to the discussion in Section 3.2.4.1. The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

Construction emissions are amortized over the life of the proposed Project (30 years) and added to each year of operational emissions.

On-terminal electricity use includes crane operation and high mast poles.

Section 3.5.5.4, Pages 3.5-79 to 3.5-84, Table 3.5-18

Revise Table 3.5-18, as follows:

Table 3.5-18: Construction and Operational GHG Emissions without Mitigation – Alternative 4 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Amortized Construction				
Ocean Disposal				112
Upland Disposal				155
Year 2018				
Ships - Transit and Anchoring	51,596	1	3	52,335
Ships – Hoteling	8,417	<1	1	8,552
AMP Electricity Use	2,335	<1	<1	2,340
Tugboats	751	<1	<1	761
Trucks	51,656	<1	2	52,135
Line Haul Locomotives	~~27,833~~ 19,318	2	1	~~28,090~~ 19,496
Switch Locomotives	261	<1	<1	263
Cargo Handling Equipment	14,798	<1	<1	14,893
On-terminal Electricity Use	2,082	<1	<1	2,091
Worker Vehicles	3,412	<1	1	3,565
Total Operational Year 2018	~~163,140~~ 154,626	5	7	~~165,024~~ 156,431
With Ocean Disposal				
Total Construction and Operations Year 2018				~~165,135~~ 156,543

Table 3.5-18: Construction and Operational GHG Emissions without Mitigation – Alternative 4 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~-10,941~~ -10,925
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~ 162,956
Alternative 4 Minus NEPA Baseline				~~-7,854~~ -6,413
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2018				~~165,178~~ 156,586
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~-10,898~~ -10,882
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~ 162,956
Alternative 4 Minus NEPA Baseline				~~-7,811~~ -6,370
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2019				
Ships - Transit and Anchoring	51,644	1	3	52,403
Ships – Hoteling	8,755	<1	1	8,894
AMP Electricity Use	2,190	<1	<1	2,195
Tugboats	793	<1	<1	802
Trucks	53,496	<1	2	53,992
Line Haul Locomotives	~~27,654~~	2	1	~~27,910~~

Table 3.5-18: Construction and Operational GHG Emissions without Mitigation – Alternative 4 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
	19,067			19,244
Switch Locomotives	264	<1	<1	266
Cargo Handling Equipment	16,298	1	<1	16,406
On-terminal Electricity Use	4,447	<1	<1	4,456
Worker Vehicles	3,108	<1	1	3,257
Total Operational Year 2019	~~168,669~~ 160,062	5	7	~~170,581~~ 161,915
With Ocean Disposal				
Total Construction and Operations Year 2019				~~170,693~~ 162,027
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~-5,383~~ -5,441
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Alternative 4 Minus NEPA Baseline				~~-6,742~~ -4,798
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2019				~~170,736~~ 162,070
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~-5,340~~ -5,398
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Alternative 4 Minus NEPA Baseline				~~-6,699~~ -4,755

Table 3.5-18: Construction and Operational GHG Emissions without Mitigation – Alternative 4 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2026				
Ships - Transit and Anchoring	56,112	1	3	56,914
Ships – Hoteling	11,447	<1	1	11,623
AMP Electricity Use	3,637	<1	<1	3,645
Tugboats	793	<1	<1	802
Trucks	57,658	<1	2	58,180
Line Haul Locomotives	~~42,942~~ 24,841	~~4~~ 2	1	~~43,338~~ 25,070
Switch Locomotives	367	<1	<1	370
Cargo Handling Equipment	21,900	1	<1	22,047
On-terminal Electricity Use	5,172	<1	<1	5,183
Worker Vehicles	2,955	<1	1	3,131
Total Operational Year 2026	~~202,982~~ 184,882	~~6~~ 4	8	~~205,233~~ 186,965
With Ocean Disposal				
Total Construction and Operations Year 2026				~~205,345~~ 187,077
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~29,269~~ 19,609
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ 164,989
Alternative 4 Minus NEPA Baseline				~~28,826~~ 22,088
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				~~Yes~~ No
With Upland Disposal				
Total Construction and Operations Year 2026				~~205,388~~ 187,120
CEQA Impacts				

Table 3.5-18: Construction and Operational GHG Emissions without Mitigation – Alternative 4 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~29,312~~ 19,652
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ 164,989
Alternative 4 Minus NEPA Baseline				~~28,869~~ 22,131
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				~~Yes~~ No
Year 2033				
Ships - Transit and Anchoring	72,526	2	4	73,565
Ships – Hoteling	15,534	<1	1	15,777
AMP Electricity Use	5,695	<1	<1	5,707
Tugboats	1,057	<1	<1	1,070
Trucks	58,245	<1	2	58,771
Line Haul Locomotives	~~197,798~~ 55,406	~~16~~ 5	~~5~~ 2	~~199,626~~ 55,918
Switch Locomotives	822	<1	<1	829
Cargo Handling Equipment	28,082	1	1	28,270
On-terminal Electricity Use	5,971	<1	<1	5,984
Worker Vehicles	3,078	<1	1	3,285
Total Operational Year 2033	~~388,809~~ 246,416	~~20~~ 9	~~13~~ 10	~~392,883~~ 249,176
With Ocean Disposal				
Total Construction and Operations Year 2033				~~392,995~~ 249,288
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~216,918~~ 81,820
Significance Threshold				10,000
Significant?				Yes

Table 3.5-18: Construction and Operational GHG Emissions without Mitigation – Alternative 4 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 218,479
Alternative 4 Minus NEPA Baseline				~~72,749~~ 30,809
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2033				~~393,038~~ 249,331
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~216,961~~ 81,863
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 218,479
Alternative 4 Minus NEPA Baseline				~~72,792~~ 30,852
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
Year 2038				
Ships - Transit and Anchoring	72,526	2	4	73,565
Ships – Hoteling	15,534	<1	1	15,777
AMP Electricity Use	5,695	<1	<1	5,707
Tugboats	1,057	<1	<1	1,070
Trucks	57,395	<1	2	57,915
Line Haul Locomotives	~~197,798~~ 55,406	~~16~~ 5	~~5~~ 2	~~199,626~~ 55,918
Switch Locomotives	822	<1	<1	829
Cargo Handling Equipment	28,082	1	1	28,270
On-terminal Electricity Use	5,971	<1	<1	5,984
Worker Vehicles	2,921	<1	1	3,129
Total Operational Year 2038	~~387,803~~ 245,409	~~20~~ 9	~~13~~ 10	~~391,871~~ 248,164

Table 3.5-18: Construction and Operational GHG Emissions without Mitigation – Alternative 4 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
With Ocean Disposal				
Total Construction and Operations Year 2038				~~391,983~~ 248,276
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~215,907~~ 80,808
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Alternative 4 Minus NEPA Baseline				~~72,588~~ 30,649
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2038				~~392,026~~ 248,319
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~215,950~~ 80,851
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Alternative 4 Minus NEPA Baseline				~~72,631~~ 30,692
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes

Notes: Emissions might not add precisely because of rounding. For more explanation, refer to the discussion in Section 3.2.4.1. The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

Construction emissions are amortized over the life of the proposed Project (30 years) and added to each year of operational emissions.

On-terminal electricity use includes crane operation and high mast poles.

Section 3.5.5.4, Pages 3.5-86 to 3.5-91, Table 3.5-20

Revise Table 3.5-20, as follows:

Table 3.5-20: Construction and Operational GHG Emissions with Mitigation – Alternative 4 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Amortized Construction				
Ocean Disposal				112
Upland Disposal				156
Year 2018				
Ships - Transit and Anchoring	51,596	1	3	52,335
Ships - Hoteling	8,417	<1	1	8,552
AMP Electricity Use	2,335	<1	<1	2,340
Tugboats	751	<1	<1	761
Trucks	51,656	<1	2	52,135
Line Haul Locomotives	~~27,833~~ 19,318	2	1	~~28,090~~ 19,496
Switch Locomotives	261	<1	<1	263
Cargo Handling Equipment	14,798	<1	<1	14,893
On-terminal Electricity Use	2,082	<1	<1	2,091
Worker Vehicles	3,412	<1	1	3,565
Total Operational Year 2018	~~163,140~~ 154,626	5	7	~~165,024~~ 156,431
With Ocean Disposal				
Total Construction and Operations Year 2018				~~165,136~~ 156,543
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~-10,941~~ -10,925
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~ 162,956
Alternative 4 Minus NEPA Baseline				~~-7,854~~ -6,413
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				

Table 3.5-20: Construction and Operational GHG Emissions with Mitigation – Alternative 4 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Total Construction and Operations Year 2018				~~165,179~~ 156,587
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~-10,897~~ -10,881
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~ 162,956
Alternative 4 Minus NEPA Baseline				~~-7,810~~ -6,369
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2019				
Ships - Transit and Anchoring	51,182	1	3	51,916
Ships – Hoteling	8,620	<1	1	8,758
AMP Electricity Use	2,340	<1	<1	2,345
Tugboats	793	<1	<1	802
Trucks	53,496	<1	2	53,992
Line Haul Locomotives	~~27,654~~ 19,067	2	1	~~27,910~~ 19,244
Switch Locomotives	264	<1	<1	266
Cargo Handling Equipment	16,298	1	<1	16,406
On-terminal Electricity Use	3,189	<1	<1	3,196
Worker Vehicles	3,108	<1	1	3,257
Total Operational Year 2019	~~166,945~~ 158,357	5	7	~~168,848~~ 160,182
With Ocean Disposal				
Total Construction and Operations Year 2019				~~168,960~~ 160,294
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~-7,116~~ -7,174

Table 3.5-20: Construction and Operational GHG Emissions with Mitigation – Alternative 4 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Alternative 4 Minus NEPA Baseline				~~-8,475~~ -6,531
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2019				~~169,004~~ 160,338
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~-7,073~~ -7,130
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Alternative 4 Minus NEPA Baseline				~~-8,432~~ -6,487
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2026				
Ships - Transit and Anchoring	55,528	1	3	56,322
Ships – Hoteling	10,597	<1	1	10,764
AMP Electricity Use	4,323	<1	<1	4,332
Tugboats	793	<1	<1	802
Trucks	57,658	<1	2	58,180
Line Haul Locomotives	~~42,942~~ 24,841	~~4~~ 2	1	~~43,338~~ 25,070
Switch Locomotives	367	<1	<1	370
Cargo Handling Equipment	21,900	1	<1	22,047
On-terminal Electricity Use	3,914	<1	<1	3,922
Worker Vehicles	2,955	<1	1	3,131

Table 3.5-20: Construction and Operational GHG Emissions with Mitigation – Alternative 4 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Total Operational Year 2026	~~200,976~~ 182,876	~~6~~ 4	8	~~203,210~~ 184,940
With Ocean Disposal				
Total Construction and Operations Year 2026				~~203,322~~ 185,052
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~27,245~~ 17,584
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ 164,989
Alternative 4 Minus NEPA Baseline				~~26,802~~ 20,063
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2026				~~203,365~~ 185,096
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~27,289~~ 17,628
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ 164,989
Alternative 4 Minus NEPA Baseline				~~26,846~~ 20,107
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2033				
Ships - Transit and Anchoring	71,816	2	4	72,846
Ships – Hoteling	14,242	<1	1	14,470

Table 3.5-20: Construction and Operational GHG Emissions with Mitigation – Alternative 4 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
AMP Electricity Use	6,736	<1	<1	6,750
Tugboats	1,057	<1	<1	1,070
Trucks	58,245	<1	2	58,771
Line Haul Locomotives	~~197,798~~ 55,406	~~16~~ 5	~~5~~ 2	~~199,626~~ 55,918
Switch Locomotives	822	<1	<1	829
Cargo Handling Equipment	28,082	1	1	28,270
On-terminal Electricity Use	4,714	<1	<1	4,724
Worker Vehicles	3,078	<1	1	3,285
Total Operational Year 2033	~~386,589~~ 244,198	~~19~~ 8	~~13~~ 10	~~390,637~~ 246,933
With Ocean Disposal				
Total Construction and Operations Year 2033				~~390,752~~ 247,045
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~214,676~~ 79,577
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 218,479
Alternative 4 Minus NEPA Baseline				~~70,506~~ 28,566
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2033				~~390,796~~ 247,089
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~214,719~~ 79,621
Significance Threshold				10,000
Significant?				Yes

Table 3.5-20: Construction and Operational GHG Emissions with Mitigation – Alternative 4 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 218,479
Alternative 4 Minus NEPA Baseline				~~70,550~~ 28,610
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
Year 2038				
Ships - Transit and Anchoring	71,816	2	4	72,846
Ships - Hoteling	14,242	<1	1	14,470
AMP Electricity Use	6,736	<1	<1	6,750
Tugboats	1,057	<1	<1	1,070
Trucks	57,395	<1	2	57,915
Line Haul Locomotives	~~197,798~~ 55,406	~~16~~ 5	~~5~~ 2	~~199,626~~ 55,918
Switch Locomotives	822	<1	<1	829
Cargo Handling Equipment	28,082	1	1	28,270
On-terminal Electricity Use	4,714	<1	<1	4,724
Worker Vehicles	2,921	<1	1	3,129
Total Operational Year 2038	~~385,583~~ 243,191	~~19~~ 8	~~13~~ 10	~~389,628~~ 245,921
With Ocean Disposal				
Total Construction and Operations Year 2038				~~389,740~~ 246,033
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~213,664~~ 78,565
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Alternative 4 Minus NEPA Baseline				~~70,346~~ 28,406
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes

Table 3.5-20: Construction and Operational GHG Emissions with Mitigation – Alternative 4 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
With Upland Disposal				
Total Construction and Operations Year 2038				~~389,784~~ 246,077
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 4 Minus CEQA Baseline				~~213,707~~ 78,609
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Alternative 4 Minus NEPA Baseline				~~70,389~~ 28,450
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes

Notes:

Emissions might not add precisely because of rounding. For more explanation, refer to the discussion in Section 3.2.4.1. The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

Construction emissions are amortized over the life of the proposed Project (30 years) and added to each year of operational emissions.

On-terminal electricity use includes crane operation and high mast poles.

Section 3.5.5.4, Pages 3.5-93 to 3.5-99, Table 3.5-22

Revise Table 3.5-22, as follows:

Table 3.5-22: Construction and Operational GHG Emissions without Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Amortized Construction				
Ocean Disposal				176
Upland Disposal				219
Year 2018				
Ships - Transit and Anchoring	51,596	1	3	52,335
Ships – Hoteling	8,417	<1	1	8,552
AMP Electricity Use	2,335	<1	<1	2,340
Tugboats	751	<1	<1	761
Trucks	51,656	<1	2	52,135
Line Haul Locomotives	~~27,833~~ 20,141	2	1	~~28,090~~ 20,327
Switch Locomotives	261	<1	<1	263
Cargo Handling Equipment	14,798	<1	<1	14,893
On-terminal Electricity Use	2,082	<1	<1	2,091
Worker Vehicles	3,412	<1	1	3,565
Total Operational Year 2018	~~163,140~~ 155,449	5	7	~~165,024~~ 157,262
With Ocean Disposal				
Total Construction and Operations Year 2018				~~165,200~~ 157,438
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~-10,876~~ -10,030
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~ 162,956
Alternative 5 Minus NEPA Baseline				~~-7,789~~ -5,518
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2018				~~165,243~~ 157,481

Table 3.5-22: Construction and Operational GHG Emissions without Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~-10,833~~ -9,987
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~ 162,956
Alternative 5 Minus NEPA Baseline				~~-7,746~~ -5,475
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2019				
Ships - Transit and Anchoring	53,919	1	3	54,690
Ships – Hoteling	9,557	<1	1	9,707
AMP Electricity Use	2,517	<1	<1	2,523
Tugboats	793	<1	<1	802
Trucks	56,690	<1	2	57,215
Line Haul Locomotives	~~30,846~~ 20,261	~~3~~ 2	1	~~31,131~~ 20,449
Switch Locomotives	279	<1	<1	282
Cargo Handling Equipment	18,475	1	<1	18,601
On-terminal Electricity Use	4,568	<1	<1	4,578
Worker Vehicles	3,198	<1	1	3,351
Total Operational Year 2019	~~180,842~~ 170,257	~~5~~ 4	7	~~182,880~~ 172,198
With Ocean Disposal				
Total Construction and Operations Year 2019				~~183,057~~ 172,374
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~6,980~~ 4,906
Significance Threshold				10,000
Significant?				No

Table 3.5-22: Construction and Operational GHG Emissions without Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Alternative 5 Minus NEPA Baseline				~~5,621~~ 5,549
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2019				~~183,100~~ 172,417
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~7,023~~ 4,949
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Alternative 5 Minus NEPA Baseline				~~5,664~~ 5,592
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2026				
Ships - Transit and Anchoring	56,488	1	3	57,297
Ships – Hoteling	13,532	<1	1	13,740
AMP Electricity Use	5,310	<1	<1	5,321
Tugboats	793	<1	<1	802
Trucks	64,509	<1	2	65,094
Line Haul Locomotives	~~52,835~~ 27,759	~~4~~ 2	1	~~53,324~~ 28,015
Switch Locomotives	410	<1	<1	413
Cargo Handling Equipment	26,244	1	1	26,424
On-terminal Electricity Use	5,506	<1	<1	5,518
Worker Vehicles	3,176	<1	1	3,365
Total Operational Year 2026	~~228,802~~ 203,727	~~7~~ 5	9	~~231,297~~ 205,989

Table 3.5-22: Construction and Operational GHG Emissions without Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
With Ocean Disposal				
Total Construction and Operations Year 2026				~~231,474~~ 206,165
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~55,398~~ 38,697
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ 164,989
Alternative 5 Minus NEPA Baseline				~~54,955~~ 41,176
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2026				~~231,517~~ 206,208
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~55,441~~ 38,740
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ 164,989
Alternative 5 Minus NEPA Baseline				~~54,998~~ 41,219
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
Year 2033				
Ships - Transit and Anchoring	75,206	2	4	76,283
Ships – Hoteling	16,741	<1	1	17,003
AMP Electricity Use	6,201	<1	<1	6,214

Table 3.5-22: Construction and Operational GHG Emissions without Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Tugboats	1,057	<1	<1	1,070
Trucks	66,412	<1	2	67,012
Line Haul Locomotives	~~248,116~~ 62,265	~~20~~ 5	~~7~~ 2	~~250,408~~ 62,840
Switch Locomotives	924	<1	<1	932
Cargo Handling Equipment	33,878	1	1	34,111
On-terminal Electricity Use	6,426	<1	<1	6,439
Worker Vehicles	3,340	<1	1	3,564
Total Operational Year 2033	~~458,301~~ 272,450	~~24~~ 9	~~15~~ 10	~~463,036~~ 275,468
With Ocean Disposal				
Total Construction and Operations Year 2033				~~463,213~~ 275,644
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~287,136~~ 108,176
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 217,627
Alternative 5 Minus NEPA Baseline				~~142,967~~ 58,017
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2033				~~463,256~~ 275,687
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~287,179~~ 108,219
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				

Table 3.5-22: Construction and Operational GHG Emissions without Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
NEPA Baseline Emissions				~~320,246~~ 217,627
Alternative 5 Minus NEPA Baseline				~~143,010~~ 58,060
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
Year 2038				
Ships - Transit and Anchoring	75,206	2	4	76,283
Ships – Hoteling	16,741	<1	1	17,003
AMP Electricity Use	6,201	<1	<1	6,214
Tugboats	1,057	<1	<1	1,070
Trucks	65,443	<1	2	66,036
Line Haul Locomotives	~~248,116~~ 62,265	~~20~~	~~7~~	~~250,408~~ 62,840
Switch Locomotives	924	<1	<1	932
Cargo Handling Equipment	33,878	1	1	34,111
On-terminal Electricity Use	6,426	<1	<1	6,439
Worker Vehicles	3,170	<1	1	3,394
Total Operational Year 2038	~~457,163~~ 271,311	~~24~~	~~15~~	~~461,891~~ 274,322
With Ocean Disposal				
Total Construction and Operations Year 2038				~~462,067~~ 274,498
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~285,991~~ 107,030
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Alternative 5 Minus NEPA Baseline				~~142,673~~ 56,871
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes

Table 3.5-22: Construction and Operational GHG Emissions without Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
With Upland Disposal				
Total Construction and Operations Year 2038				~~462,110~~ 274,541
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~286,034~~ 107,073
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Alternative 5 Minus NEPA Baseline				~~142,716~~ 56,914
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes

Notes:

Emissions might not add precisely because of rounding. For more explanation, refer to the discussion in Section 3.2.4.1. The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

Construction emissions are amortized over the life of the proposed Project (30 years) and added to each year of operational emissions.

On-terminal electricity use includes crane operation and high mast poles.

Section 3.5.5.4, Pages 3.5-100 to 3.5-106, Table 3.5-24

Revise Table 3.5-24, as follows:

Table 3.5-24: Construction and Operational GHG Emissions with Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Amortized Construction				
Ocean Disposal				177
Upland Disposal				221
Year 2018				
Ships - Transit and Anchoring	51,596	1	3	52,335
Ships - Hoteling	8,417	<1	1	8,552
AMP Electricity Use	2,335	<1	<1	2,340
Tugboats	751	<1	<1	761

Table 3.5-24: Construction and Operational GHG Emissions with Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Trucks	51,656	<1	2	52,135
Line Haul Locomotives	~~27,833~~ 20,141	2	1	~~28,090~~ 20,327
Switch Locomotives	261	<1	<1	263
Cargo Handling Equipment	14,798	<1	<1	14,893
On-terminal Electricity Use	2,082	<1	<1	2,091
Worker Vehicles	3,412	<1	1	3,565
Total Operational Year 2018	~~163,140~~ 155,449	5	7	~~165,024~~ 157,262
With Ocean Disposal				
Total Construction and Operations Year 2018				~~165,201~~ 157,439
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~-10,876~~ -10,029
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~ 162,956
Alternative 5 Minus NEPA Baseline				~~-7,789~~ -5,517
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2018				~~165,244~~ 157,483
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~-10,832~~ -9,985
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~172,989~~

Table 3.5-24: Construction and Operational GHG Emissions with Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
				162,956
Alternative 5 Minus NEPA Baseline				~~-7,745~~ -5,473
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2019				
Ships - Transit and Anchoring	53,398	1	3	54,163
Ships - Hoteling	9,408	<1	1	9,556
AMP Electricity Use	2,682	<1	<1	2,687
Tugboats	793	<1	<1	802
Trucks	56,690	<1	2	57,215
Line Haul Locomotives	~~30,846~~ 20,261	~~3~~ 2	1	~~31,131~~ 20,449
Switch Locomotives	279	<1	<1	282
Cargo Handling Equipment	18,475	1	<1	18,601
On-terminal Electricity Use	3,311	<1	<1	3,318
Worker Vehicles	3,198	<1	1	3,351
Total Operational Year 2019	~~179,079~~ 168,495	~~5~~ 4	7	~~181,107~~ 170,424
With Ocean Disposal				
Total Construction and Operations Year 2019				~~181,284~~ 170,601
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~5,208~~ 3,133
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Proposed Project Minus NEPA Baseline				~~3,849~~ 3,776
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
With Upland Disposal				
Total Construction and Operations Year 2019				~~181,328~~

Table 3.5-24: Construction and Operational GHG Emissions with Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
				~~170,645~~ 170,645
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~5,251~~ 3,177
Significance Threshold				10,000
Significant?				No
NEPA Impacts				
NEPA Baseline Emissions				~~177,435~~ 166,825
Alternative 5 Minus NEPA Baseline				~~3,892~~ 3,820
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				No
Year 2026				
Ships - Transit and Anchoring	55,974	1	3	56,777
Ships - Hoteling	12,292	<1	1	12,487
AMP Electricity Use	6,291	<1	<1	6,304
Tugboats	793	<1	<1	802
Trucks	64,509	<1	2	65,094
Line Haul Locomotives	~~52,835~~ 27,759	~~4~~	1	~~53,324~~ 28,015
Switch Locomotives	410	<1	<1	413
Cargo Handling Equipment	26,244	1	1	26,424
On-terminal Electricity Use	4,248	<1	<1	4,257
Worker Vehicles	3,176	<1	1	3,365
Total Operational Year 2026	~~226,772~~ 201,696	~~7~~	9	~~229,247~~ 203,938
With Ocean Disposal				
Total Construction and Operations Year 2026				~~229,424~~ 204,115
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~53,348~~ 36,647
Significance Threshold				10,000

Table 3.5-24: Construction and Operational GHG Emissions with Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ 164,989
Alternative 5 Minus NEPA Baseline				~~52,905~~ 39,126
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2026				~~229,468~~ 204,159
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~53,391~~ 36,691
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~176,519~~ 164,989
Alternative 5 Minus NEPA Baseline				~~52,948~~ 39,170
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
Year 2033				
Ships - Transit and Anchoring	74,454	2	4	75,522
Ships - Hoteling	15,316	<1	1	15,561
AMP Electricity Use	7,344	<1	<1	7,359
Tugboats	1,057	<1	<1	1,070
Trucks	66,412	<1	2	67,012
Line Haul Locomotives	~~248,116~~ 62,265	~~20~~ 5	~~7~~ 2	~~250,408~~ 62,840
Switch Locomotives	924	<1	<1	932
Cargo Handling Equipment	33,878	1	1	34,111
On-terminal Electricity Use	5,168	<1	<1	5,179
Worker Vehicles	3,340	<1	1	3,564
Total Operational Year 2033	~~456,009~~	~~24~~	~~15~~	~~460,716~~

Table 3.5-24: Construction and Operational GHG Emissions with Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
	270,158	9	10	273,150
With Ocean Disposal				
Total Construction and Operations Year 2033				~~460,896~~ 273,327
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~284,820~~ 105,859
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 218,479
Alternative 5 Minus NEPA Baseline				~~140,650~~ 54,848
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2033				~~460,940~~ 273,371
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~284,863~~ 105,903
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~320,246~~ 218,479
Alternative 5 Minus NEPA Baseline				~~140,694~~ 54,892
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
Year 2038				
Ships - Transit and Anchoring	69,260	2	4	70,327
Ships - Hoteling	15,056	<1	1	15,301

Table 3.5-24: Construction and Operational GHG Emissions with Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
AMP Electricity Use	7,344	<1	<1	7,359
Tugboats	1,057	<1	<1	1,070
Trucks	65,443	<1	2	66,036
Line Haul Locomotives	~~248,116~~ 62,265	~~20~~ 5	~~7~~ 2	~~250,408~~ 62,840
Switch Locomotives	924	<1	<1	932
Cargo Handling Equipment	33,878	1	1	34,111
On-terminal Electricity Use	5,168	<1	<1	5,179
Worker Vehicles	3,170	<1	1	3,394
Total Operational Year 2038	~~449,416~~ 263,565	~~24~~ 9	~~15~~ 10	~~454,119~~ 266,549
With Ocean Disposal				
Total Construction and Operations Year 2038				~~454,296~~ 266,726
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~278,219~~ 99,258
Significance Threshold				10,000
Significant?				Yes
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Alternative 5 Minus NEPA Baseline				~~134,901~~ 49,099
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes
With Upland Disposal				
Total Construction and Operations Year 2038				~~454,339~~ 266,770
CEQA Impacts				
CEQA Baseline Emissions				~~176,076~~ 167,468
Alternative 5 Minus CEQA Baseline				~~278,263~~ 99,302
Significance Threshold				10,000
Significant?				Yes

Table 3.5-24: Construction and Operational GHG Emissions with Mitigation – Alternative 5 (mty)

Source Category	CO_2	CH_4	N_2O	CO_2e
NEPA Impacts				
NEPA Baseline Emissions				~~319,394~~ 217,627
Alternative 5 Minus NEPA Baseline				~~134,945~~ 49,143
CEQ Reference Level				25,000
Exceeds CEQ Reference Level?				Yes

Notes:

Emissions might not add precisely because of rounding. For more explanation, refer to the discussion in Section 3.2.4.1. The emission estimates presented in this table were calculated using the latest available data, assumptions, and emission factors at the time this document was prepared. Future studies might use updated data, assumptions, and emission factors that are not currently available.

Construction emissions are amortized over the life of the proposed Project (30 years) and added to each year of operational emissions.

On-terminal electricity use includes crane operation and high mast poles.

Section 3.5.5.6, Page 3.5-110

Revise lease measure LM GHG-1, as follows:

Mitigation Measure	**LM GHG-1: GHG Credit Fund.** Proposed Project GHG emissions are ~~278,708~~99,812 metric tons of CO2e above the CEQA Baseline in the peak year of operations in 2038. They exceed the 10,000 metric ton CO2e significance threshold by ~~268,708~~99,856 metric tons. Because operational GHG emissions exceed the significance threshold with the incorporation of all feasible mitigation measures, LAHD shall establish a carbon offset fund, which may be accomplished through a Memorandum of Understanding with the California Air Resources Board or another appropriate entity, to mitigate project GHG impacts to the maximum extent feasible. The fund shall be used for GHG-reducing projects and programs on Port of Los Angeles property. It shall be the responsibility of the Tenant to contribute to the fund. Fund contribution shall be the equivalent of 1 percent of the minimum annual guarantee (MAG) at the time that project construction will commence. This amount will be approximately $300,000~~$250,000~~, payable upon substantial completion of Project construction. This amount is appropriate because it takes into account the tenant's actual container throughput and assesses a fee in correlation with the facility's GHG ~~$250,000 has been identified as the maximum feasible~~ contribution level. ~~taking into account the cost of the proposed Project, including on-site GHG-reducing mitigation measures that the tenant will be required to implement (LED high mast lighting and solar panels over the employee parking lot).~~ If LAHD is unable to establish the fund within a reasonable period of time, the Tenant shall instead purchase credits from an approved GHG offset registry in the amount of approximately $300,000~~$250,000~~.

3.2.5 Changes Made to Section 3.6, Ground Transportation

Section 3.6.4.5, Page 3.6-77, Table 3.6-32

Revise Table 3.6-32, as follows:

Table 3.6-32: CEQA Baseline Compared to 2038 With Proposed Project - Freeway Analysis—A.M. Peak

Freeway	Location	Cap.	Northbound / Eastbound											Southbound / Westbound										
			CEQA Baseline					2038 With Proposed Project					Change in D/C	Sign. Impt?	CEQA Baseline					2038 With Proposed Project					Change in D/C	Sign. Impt?
			Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS			Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS		
#1 SR-47	Vincent Thomas Bridge [12]	4,700	1,876	18.0	B	-		1,918	18.4	C	-		-	No	2,235	21.4	C	-		2,263	21.7	C	-		-	No
#2 SR-47/SR-103	Commodore Schuyler Heim Bridge [12]	6,750	1,119	7.1	A	-		1,145	7.3	A	-		-	No	922	5.9	A	-		970	6.2	A	-		-	No
#3 I-110	South of C Street (CMP monitoring station—south of C Street)	9,400	3,771	15.3	B	-		3,792	15.4	B	-		-	No	5,096	20.6	C	-		5,113	20.7	C	-		-	No
#4 I-110	North of 223rd Street [12]	9,400	6,352	26.1	D	-		6,365	26.2	D	-		-	No	8,422	28.1	D	-		8,435	28.2	D	-		-	No
#5 I-110	North of I-405 [12]	11,750	10,565	40.2	E	0.90	D	10,574	40.2	E	0.90	D	0.00	No	9,265	32.1	D	-		9,272	32.2	D	-		-	No
#6 I-710	North of PCH (CMP monitoring station—north of the junction of SR-1 [PCH], Willow Street)	6,750	6,442	45.4	F	0.95	E	6,487	46.1	F	0.96	E	0.01	No	6,545	47.0	F	0.97	E	6,591	47.7	F	0.98	E	0.01	No
#7 I-710	North of I-405 (CMP monitoring station—north of the junction I-405, south of Del Amo)	9,000	7,998	39.9	E	0.89	D	8,040	40.3	E	0.89	D	0.00	No	7,617	37.1	E	0.85	D	7,664	37.5	E	0.85	D	0.01	No
#8 I-710	North of Alondra Boulevard [12]	11,750	8,025	26.5	D	-		8,062	26.6	D	-		-	No	7,631	24.9	C	-		7,675	25.1	C	-		-	No
#9 I-710	North of I-105 and north of Firestone Boulevard (CMP monitoring station)	9,400	7,932	35.8	E	0.84	D	7,960	36.0	E	0.85	D	0.01	No	7,376	31.9	D	-		7,411	32.1	D	-		-	No
#10 I-710	North of Florence Avenue[12]	9,400	8,535	41.0	E	0.91	D	8,562	41.2	E	0.91	D	0.00	No	7,518	32.8	D	-		7,552	33.1	D	-		-	No
#11 I-405	Between I-110 and I-710 (CMP monitoring station—Santa Fe Avenue)	11,750	6,587	21.3	C	-		6,587	21.3	C	-		-	No	9,895	35.7	E	0.84	D	9,895	35.7	E	0.84	D	0.00	No
#12 SR-91	West of I-710 (CMP monitoring station—east of Alameda Street/Santa Fe Avenue interchange)	14,100	6,619	17.9	B	-		6,619	17.9	B	-		-	No	8,384	22.7	C	-		8,385	22.7	C	-		-	No

Notes: Freeway operation conditions based on the methodology in the 2010 HCM where level of service is based on density (passenger car per mile per lane).
[1]Per Caltrans traffic impact study guidelines, Caltrans targets maintaining LOS between C and D; for segments where 2010 HCM LOS is E or F, D/C was used to determine impact significance per CMP guidelines.
[12]Non-CMP location

1

Section 3.6.4.5, Page 3.6-78, Table 3.6-33

Revise Table 3.6-33, as follows:

Table 3.6-33: CEQA Baseline Compared to 2038 With Proposed Project - Freeway Analysis—P.M. Peak

Freeway	Location	Cap.	Northbound / Eastbound											Southbound / Westbound										
			CEQA Baseline					2038 With Proposed Project					Change in D/C	Sign. Impt?	CEQA Baseline					2026 With Proposed Project					Change in D/C	Sign. Impt?
			Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS			Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS		
#1 SR-47	Vincent Thomas Bridge ~~1~~2	4,700	2,764	26.4	D	-		2,828	27.1	D	-		-	No	2,759	26.4	D	-		2,787	26.7	D	-		-	No
#2 SR-47/SR-103	Commodore Schuyler Heim Bridge ~~1~~2	6,750	1,173	7.5	A	-		1,229	7.8	A	-		-	No	997	6.4	A	-		1,041	6.6	A	-		-	No
#3 I-110	South of C Street (CMP monitoring station—south of C Street)	9,400	4,678	18.9	C	-		4,719	19.1	C	-		-	No	3,302	13.4	B	-		3,318	13.4	B	-		-	No
#4 I-110	North of 223rd Street ~~1~~2	9,400	7,686	34.0	D	-		7,709	34.2	D	-		-	No	5,699	18.5	C	-		5,712	18.5	C	-		-	No
#5 I-110	North of I-405 ~~1~~2	11,750	10,440	39.3	E	0.89	D	10,453	39.4	E	0.89	D	0.00	No	9,002	30.8	D	-		9,010	30.8	D	-		-	No
#6 I-710	North of PCH (CMP monitoring station—north of the junction of SR-1 [PCH], Willow Street)	6,750	5,819	38.1	E	0.86	D	5,893	38.8	E	0.87	D	0.01	No	5,659	36.7	E	0.84	D	5,719	37.2	E	0.85	D	0.01	No
#7 I-710	North of I-405 (CMP monitoring station—north of the junction of I-405, south of Del Amo)	9,000	6,785	32.5	D	-		6,857	32.8	D	-		-	No	7,526	36.5	E	0.84	D	7,585	36.9	E	0.84	D	0.00	No
#8 I-710	North of Alondra Boulevard ~~1~~2	11,750	6,491	21.0	C	-		6,555	21.2	C	-		-	No	7,868	25.9	C	-		7,927	26.1	D	-		-	No
#9 I-710	North of I-105 and north of Firestone Boulevard (CMP monitoring station)	9,400	6,466	26.7	D	-		6,514	27.0	D	-		-	No	7,838	35.1	E	0.83	D	7,879	35.4	E	0.84	D	0.01	No
#10 I-710	North of Florence Avenue~~1~~2	9,400	5,550	22.5	C	-		5,595	22.7	C	-		-	No	7,824	35.0	D	0.83	D	7,862	35.3	E	0.84	D	0.01	No
#11 I-405	Between I-110 and I-710 (CMP monitoring station—Santa Fe Avenue)	11,750	10,127	37.1	E	0.86	D	10,127	37.1	E	0.86	D	0.00	No	8,669	29.2	D	-		8,669	29.2	D	-		-	No
#12 SR-91	West of I-710 (CMP monitoring station—east of Alameda Street/Santa Fe Avenue interchange)	14,100	7,780	21.0	C	-		7,780	21.0	C	-		-	No	6,032	22.1	B	-		6,032	16.3	B	-		-	No

Notes: Freeway operation conditions based on the methodology in the 2010 HCM where level of service is based on density (passenger car per mile per lane).
[1]Per Caltrans traffic impact study guidelines, Caltrans targets maintaining LOS between C and D; for segments where 2010 HCM LOS is E or F, D/C was used to determine impact significance per CMP guidelines.
~~1~~2Non-CMP location

1

Section 3.6.4.5, Page 3.6-79, Table 3.6-34

Revise Table 3.6-34, as follows:

Table 3.6-34: 2019 NEPA Baseline Compared to 2019 With Proposed Project - Freeway Analysis—A.M. Peak

			Northbound / Eastbound											Southbound / Westbound										
			2019 NEPA Baseline					2019 With Proposed Project						2019 NEPA Baseline					2019 With Proposed Project					
Freeway	Location	Cap.	Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS	Change in D/C	Sign. Impt?	Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS	Change in D/C	Sign. Impt?
#1 SR-47	Vincent Thomas Bridge [1,2]	4,700	3,508	33.6	D	-		3,508	33.6	D	-		-	No	3,199	30.6	D	-		3,199	30.6	D	-		-	No
#2 SR-47/SR-103	Commodore Schuyler Heim Bridge [1,2]	6,750	642	4.1	A	-		642	4.1	A	-		-	No	1,422	9.1	A	-		1,422	9.1	A	-		-	No
#3 I-110	South of C Street (CMP monitoring station—south of C Street)	9,400	5,565	22.6	C	-		5,565	22.6	C	-		-	No	4,879	19.8	C	-		4,879	19.8	C	-		-	No
#4 I-110	North of 223rd Street [1,2]	9,400	8,975	45.5	F	0.95	E	8,975	45.5	F	0.95	E	0.00	No	7,372	24.0	C	-		7,372	24.0	C	-		-	No
#5 I-110	North of I-405 [1,2]	11,750	10,531	39.9	E	0.90	D	10,531	39.9	E	0.90	D	0.00	No	11,295	46.2	F	0.96	E	11,295	46.2	F	0.96	E	0.00	No
#6 I-710	North of PCH (CMP monitoring station—north of the junction of SR-1 [PCH], Willow Street)	6,750	5,555	35.8	E	0.82	D	5,555	35.8	E	0.82	D	0.00	No	7,020	55.8	F	1.04	F(0)	7,020	55.8	F	1.04	F(0)	0.00	No
#7 I-710	North of I-405 (CMP monitoring station—north of the junction of I-405, south of Del Amo)	9,000	8,045	40.3	E	0.89	D	8,045	40.3	E	0.89	D	0.00	No	8,161	41.3	E	0.91	D	8,161	41.3	E	0.91	D	0.00	No
#8 I-710	North of Alondra Boulevard [1,2]	11,750	8,181	27.1	D	-		8,181	27.1	D	-		-	No	9,080	31.2	D	-		9,080	31.2	D	-		-	No
#9 I-710	North of I-105 and north of Firestone Boulevard (CMP monitoring station)	9,400	7,639	33.7	D	-		7,639	33.7	D	-		-	No	8,614	41.7	E	0.92	D	8,614	41.7	E	0.92	D	0.00	No
#10 I-710	North of Florence Avenue[1,2]	9,400	7,940	35.9	E	0.84	D	7,940	35.9	E	0.84	D	0.00	No	9,771	56.5	F	1.04	F(0)	9,771	56.5	F	1.04	F(0)	0.00	No
#11 I-405	Between I-110 and I-710 (CMP monitoring station—Santa Fe Avenue)	11,750	12,113	55.1	F	1.03	F(0)	12,113	55.1	F	1.03	F(0)	0.00	No	8,624	29.0	D	-		8,624	29.0	D	-		-	No
#12 SR-91	West of I-710 (CMP monitoring station—east of Alameda Street/Santa Fe Avenue interchange)	14,100	9,884	27.3	D	-		9,884	27.3	D	-		-	No	8,460	22.9	C	-		8,460	22.9	C	-		-	No

Notes: Freeway operation conditions based on the methodology in the 2010 HCM where level of service is based on density (passenger car per mile per lane).
[1]Per Caltrans traffic impact study guidelines, Caltrans targets maintaining LOS between C and D; for segments where 2010 HCM LOS is E or F, D/C was used to determine impact significance per CMP guidelines.
[1,2]Non-CMP location

Section 3.6.4.5, Page 3.6-80, Table 3.6-35

Revise Table 3.6-35, as follows:

Table 3.6-35: 2019 NEPA Baseline Compared to 2019 With Proposed Project - Freeway Analysis—P.M. Peak

			Northbound / Eastbound												Southbound / Westbound										
			2019 NEPA Baseline					2019 With Proposed Project							2019 NEPA Baseline					2019 With Proposed Project						
Freeway	Location	Cap.	Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS	Change in D/C	Sign. Impt?	Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS	Change in D/C	Sign. Impt?
#1 SR-47	Vincent Thomas Bridge [12]	4,700~~4,207~~	4,207	43.6	E	0.90	D	4,207	43.6	E	0.90	D	0.00	No	3,687	35.6	E	0.78	D	3,687	35.6	E	0.78	D	0.00	No
#2 SR-47/SR-103	Commodore Schuyler Heim Bridge [12]	6,750~~1,466~~	1,466	9.4	A	-		1,466	9.4	A	-		-	No	1,704	10.9	A	-		1,704	10.9	A	-		-	No
#3 I-110	South of C Street (CMP monitoring station—south of C Street)	9,400~~4,629~~	4,629	18.7	C	-		4,629	18.7	C	-		-	No	5,500	22.3	C	-		5,500	22.3	C	-		-	No
#4 I-110	North of 223rd Street [12]	9,400~~6,802~~	6,802	28.5	D	-		6,802	28.5	D	-		-	No	8,315	27.7	D	-		8,315	27.7	D	-		-	No
#5 I-110	North of I-405 [12]	11,750~~10,188~~	10,188	37.5	E	0.87	D	10,188	37.5	E	0.87	D	0.00	No	11,048	44.0	E	0.94	E	11,048	44.0	E	0.94	E	0.00	No
#6 I-710	North of PCH (CMP monitoring station—north of the junction of SR-1 [PCH], Willow Street)	6,750~~5,441~~	5,441	34.9	D	-		5,441	34.9	D	-		-	No	6,136	41.5	E	0.91	D	6,136	41.5	E	0.91	D	0.00	No
#7 I-710	North of I-405 (CMP monitoring station—north of the junction of I-405, south of Del Amo)	9,000~~8,102~~	8,102	40.8	E	0.90	D	8,102	40.8	E	0.90	D	0.00	No	6,782	32.4	D	-		6,782	32.4	D	-		-	No
#8 I-710	North of Alondra Boulevard [12]	11,750~~8,656~~	8,656	29.2	D	-		8,656	29.2	D	-		-	No	7,172	23.3	C	-		7,172	23.3	C	-		-	No
#9 I-710	North of I-105 and north of Firestone Boulevard (CMP monitoring station)	9,400~~8,567~~	8,567	41.3	E	0.91	D	8,567	41.3	E	0.91	D	0.00	No	6,870	28.9	D	-		6,870	28.9	D	-		-	No
#10 I-710	North of Florence Avenue[12]	9,400~~8,710~~	8,710	42.7	E	0.93	D	8,710	42.7	E	0.93	D	0.00	No	6,498	26.9	D	-		6,498	26.9	D	-		-	No
#11 I-405	Between I-110 and I-710 (CMP monitoring station—Santa Fe Avenue)	11,750~~10,400~~	10,400	39.0	E	0.89	D	10,400	39.0	E	0.89	D	0.00	No	11,955	53.2	F	1.02	F(0)	11,955	53.2	F	1.02	F(0)	0.00	No
#12 SR-91	West of I-710 (CMP monitoring station—east of Alameda Street/Santa Fe Avenue interchange)	14,100~~7,720~~	7,720	20.8	C	-		7,720	20.8	C	-		-	No	9,247	22.3	C	-		9,247	13.4	C	-		-	No

Notes: Freeway operation conditions based on the methodology in the 2010 HCM where level of service is based on density (passenger car per mile per lane).
[1]Per Caltrans traffic impact study guidelines, Caltrans targets maintaining LOS between C and D; for segments where 2010 HCM LOS is E or F, D/C was used to determine impact significance per CMP guidelines.
[12]Non-CMP location

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Section 3.6.4.5, Page 3.6-81, Table 3.6-36

Revise Table 3.6-36, as follows:

Table 3.6-36: 2026 NEPA Baseline Compared to 2026 With Proposed Project - Freeway Analysis—A.M. Peak

Freeway	Location	Cap.	Northbound / Eastbound												Southbound / Westbound											
			2026 NEPA Baseline					2026 With Proposed Project					Change in D/C	Sign. Impt?	2026 NEPA Baseline					2026 With Proposed Project					Change in D/C	Sign. Impt?
			Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS			Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS		
#1 SR-47	Vincent Thomas Bridge [12]	4,700~~4,108~~	4,108	41.8	E	0.87	D	4,137	42.3	E	0.88	D	0.01	No	3,307	31.6	D	-		3,325	31.8	D	-		-	No
#2 SR-47/SR-103	Commodore Schuyler Heim Bridge [12]	6,750~~1,788~~	1,788	11.4	B	-		1,804	11.5	B	-		-	No	2,599	16.6	B	-		2,631	16.8	B	-		-	No
#3 I-110	South of C Street (CMP monitoring station—south of C Street)	9,400~~6,746~~	6,746	28.2	D	-		6,759	28.2	D	-		-	No	5,653	22.9	C	-		5,664	23.0	C	-		-	No
#4 I-110	North of 223rd Street [12]	9,400~~9,688~~	9,688	55.1	F	1.03	F(0)	9,696	55.2	F	1.03	F(0)	0.00	No	8,023	26.5	D	-		8,031	26.5	D	-		-	No
#5 I-110	North of I-405 [12]	11,750~~10,651~~	10,651	40.8	E	0.91	D	10,656	40.9	E	0.91	D	0.00	No	11,678	50.1	F	0.99	E	11,682	50.1	F	0.99	E	0.00	No
#6 I-710	North of PCH (CMP monitoring station—north of the junction of SR-1 [PCH], Willow Street)	6,750~~7,507~~	7,507	69.6	F	1.11	F(0)	7,533	70.6	F	1.12	F(0)	0.00	No	8,259	114.8	F	1.22	F(0)	8,286	117.6	F	1.23	F(0)	0.01	No
#7 I-710	North of I-405 (CMP monitoring station—north of the junction of I-405, south of Del Amo)	9,000~~9,396~~	9,396	56.4	F	1.04	F(0)	9,421	56.8	F	1.05	F(0)	0.00	No	9,201	53.3	F	1.02	F(0)	9,229	53.7	F	1.03	F(0)	0.00	No
#8 I-710	North of Alondra Boulevard [12]	11,750~~8,932~~	8,932	30.5	D	-		8,954	30.6	D	-		-	No	9,586	33.9	D	-		9,612	34.0	D	-		-	No
#9 I-710	North of I-105 and north of Firestone Boulevard (CMP monitoring station)	9,400~~8,066~~	8,066	36.9	E	0.86	D	8,082	37.0	E	0.86	D	0.00	No	8,990	45.7	F	0.96	E	9,011	45.9	F	0.96	E	0.00	No
#10 I-710	North of Florence Avenue[12]	9,400~~8,146~~	8,146	37.5	E	0.87	D	8,162	37.6	E	0.87	D	0.00	No	9,796	56.9	F	1.04	F(0)	9,815	57.2	F	1.04	F(0)	0.00	No
#11 I-405	Between I-110 and I-710 (CMP monitoring station—Santa Fe Avenue)	11,750~~11,802~~	11,802	51.4	F	1.00	F(0)	11,802	51.4	F	1.00	F(0)	0.00	No	8,221	27.3	D	-		8,221	27.3	D	-		-	No
#12 SR-91	West of I-710 (CMP monitoring station—east of Alameda Street/Santa Fe Avenue interchange)	14,100~~9,515~~	9,515	26.1	D	-		9,515	26.1	D	-		-	No	8,043	21.7	C	-		8,043	21.7	C	-		-	No

Notes: Freeway operation conditions based on the methodology in the 2010 HCM where level of service is based on density (passenger car per mile per lane).
[1]Per Caltrans traffic impact study guidelines, Caltrans targets maintaining LOS between C and D; for segments where 2010 HCM LOS is E or F, D/C was used to determine impact significance per CMP guidelines.
[12]Non-CMP location

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Section 3.6.4.5, Page 3.6-82, Table 3.6-37

Revise Table 3.6-37, as follows:

Table 3.6-37: 2026 NEPA Baseline Compared to 2026 With Proposed Project - Freeway Analysis—P.M. Peak

			Northbound / Eastbound												Southbound / Westbound									
			2026 NEPA Baseline					2026 With Proposed Project							2026 NEPA Baseline					2026 With Proposed Project						
Freeway	Location	Cap.	Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS	Change in D/C	Sign. Impt?	Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS	Change in D/C	Sign. Impt?
#1 SR-47	Vincent Thomas Bridge ~~1~~2	4,700	4,163	42.8	E	0.89	D	4,207	43.6	E	0.90	D	0.01	No	3,222	30.8	D	-		3,240	31.0	D	-		-	No
#2 SR-47/SR-103	Commodore Schuyler Heim Bridge ~~1~~2	6,750	1,706	10.9	A	-		1,743	11.1	B	-		-	No	1,605	10.2	A	-		1,633	10.4	A	-		-	No
#3 I-110	South of C Street (CMP monitoring station—south of C Street)	9,400	4,631	18.7	C	-		4,658	18.9	C	-		-	No	5,235	21.2	C	-		5,245	21.2	C	-		-	No
#4 I-110	North of 223rd Street ~~1~~2	9,400	6,698	27.9	D	-		6,713	28.0	D	-		-	No	7,988	26.3	D	-		7,996	26.4	D	-		-	No
#5 I-110	North of I-405 ~~1~~2	11,750	9,867	35.5	E	0.84	D	9,875	35.6	E	0.84	D	0.00	No	10,761	41.7	E	0.92	D	10,766	41.7	E	0.92	D	0.00	No
#6 I-710	North of PCH (CMP monitoring station—north of the junction of SR-1 [PCH], Willow Street)	6,750	5,434	34.8	D	0.81	D	5,479	35.2	E	0.81	D	0.00	No	5,839	38.3	E	0.87	D	5,874	38.7	E	0.87	D	0.01	No
#7 I-710	North of I-405 (CMP monitoring station—north of the junction of I-405, south of Del Amo)	9,000	7,826	38.6	E	0.87	D	7,869	38.9	E	0.87	D	0.00	No	6,457	30.9	D	-		6,492	31.1	D	-		-	No
#8 I-710	North of Alondra Boulevard ~~1~~2	11,750	7,986	26.3	D	-		8,024	26.5	D	-		-	No	6,356	20.6	C	-		6,391	20.7	C	-		-	No
#9 I-710	North of I-105 and north of Firestone Boulevard (CMP monitoring station)	9,400	8,156	37.6	E	0.87	D	8,184	37.8	E	0.87	D	0.00	No	6,503	26.9	D	-		6,527	27.0	D	-		-	No
#10 I-710	North of Florence Avenue~~1~~2	9,400	8,198	37.9	E	0.87	D	8,225	38.2	E	0.87	D	0.00	No	5,997	24.4	C	-		6,019	24.6	C	-		-	No
#11 I-405	Between I-110 and I-710 (CMP monitoring station—Santa Fe Avenue)	11,750	9,712	34.6	D	-		9,712	34.6	D	-		-	No	10,984	43.5	E	0.93	E	10,984	43.5	E	0.93	E	0.00	No
#12 SR-91	West of I-710 (CMP monitoring station—east of Alameda Street/Santa Fe Avenue interchange)	14,100	6,920	18.7	C	-		6,920	18.7	C	-		-	No	8,447	21.2	C	-		8,447	13.4	C	-		-	No

Notes: Freeway operation conditions based on the methodology in the 2010 HCM where level of service is based on density (passenger car per mile per lane).
[1]Per Caltrans traffic impact study guidelines, Caltrans targets maintaining LOS between C and D; for segments where 2010 HCM LOS is E or F, D/C was used to determine impact significance per CMP guidelines.
~~1~~2Non-CMP location

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Section 3.6.4.5, Page 3.6-83, Table 3.6-38

Revise Table 3.6-38, as follows:

Table 3.6-38: 2038 NEPA Baseline Compared to 2038 With Proposed Project - Freeway Analysis—A.M. Peak

			Northbound / Eastbound												Southbound / Westbound									
			2038 NEPA Baseline					2038 With Proposed Project							2038 NEPA Baseline					2038 With Proposed Project						
Freeway	Location	Cap.	Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS	Change in D/C	Sign. Impt?	Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS	Change in D/C	Sign. Impt?
#1 SR-47	Vincent Thomas Bridge ~~1~~2	4,700	4,365	47.0	F	0.93	D	4,407	48.0	F	0.94	E	0.01	No	3,602	34.6	D	-		3,630	34.9	D	-		-	No
#2 SR-47/SR-103	Commodore Schuyler Heim Bridge ~~1~~2	6,750	2,180	13.9	B	-		2,205	14.1	B	-		-	No	2,964	18.9	C	-		3,012	19.2	C	-		-	No
#3 I-110	South of C Street (CMP monitoring station—south of C Street)	9,400	7,336	31.6	D	-		7,357	31.8	D	-		-	No	6,302	25.9	C	-		6,319	26.0	C	-		-	No
#4 I-110	North of 223rd Street ~~1~~2	9,400	9,889	58.5	F	1.05	F(0)	9,902	58.7	F	1.05	F(0)	0.00	No	8,407	28.1	D	-		8,420	28.1	D	-		-	No
#5 I-110	North of I-405 ~~1~~2	11,750	10,533	39.9	E	0.90	D	10,542	40.0	E	0.90	D	0.00	No	11,957	53.2	F	1.02	F(0)	11,964	53.3	F	1.02	F(0)	0.00	No
#6 I-710	North of PCH (CMP monitoring station—north of the junction of SR-1 [PCH], Willow Street)	6,750	7,865	85.5	F	1.17	F(0)	7,910	88.1	F	1.17	F(0)	0.00	No	8,784	213.8	F	1.30	F(1~~0~~)	8,830	231.5	F	1.31	F(1~~0~~)	0.01	No
#7 I-710	North of I-405 (CMP monitoring station—north of the junction of I-405, south of Del Amo)	9,000	10,029	70.2	F	1.11	F(0)	10,071	71.3	F	1.12	F(0)	0.01	No	9,583	59.9	F	1.06	F(0)	9,630	60.8	F	1.07	F(0)	0.01	No
#8 I-710	North of Alondra Boulevard ~~1~~2	11,750	9,556	33.7	D	-		9,594	33.9	D	-		-	No	10,226	37.8	E	0.87	D	10,270	38.1	E	0.87	D	0.00	No
#9 I-710	North of I-105 and north of Firestone Boulevard (CMP monitoring station)	9,400	8,567	41.3	E	0.91	D	8,595	41.5	E	0.91	D	0.00	No	9,532	52.7	F	1.01	F(0)	9,567	53.2	F	1.02	F(0)	0.01	No
#10 I-710	North of Florence Avenue~~1~~2	9,400	8,545	41.0	E	0.91	D	8,572	41.3	E	0.91	D	0.00	No	10,645	75.4	F	1.13	F(0)	10,678	76.3	F	1.14	F(0)	0.01	No
#11 I-405	Between I-110 and I-710 (CMP monitoring station—Santa Fe Avenue)	11,750	10,741	41.5	E	0.91	D	10,741	41.5	E	0.91	D	0.00	No	8,205	27.2	D	-		8,205	27.2	D	-		-	No
#12 SR-91	West of I-710 (CMP monitoring station—east of Alameda Street/Santa Fe Avenue interchange)	14,100	8,650	23.4	C	-		8,650	23.4	C	-		-	No	7,511	20.3	C	-		7,511	20.3	C	-		-	No

Notes: Freeway operation conditions based on the methodology in the 2010 HCM where level of service is based on density (passenger car per mile per lane).
[1]Per Caltrans traffic impact study guidelines, Caltrans targets maintaining LOS between C and D; for segments where 2010 HCM LOS is E or F, D/C was used to determine impact significance per CMP guidelines.
~~1~~2Non-CMP location

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Section 3.6.4.5, Page 3.6-84, Table 3.6-39

Revise Table 3.6-39, as follows:

Table 3.6-39: 2038 NEPA Baseline Compared to 2038 With Proposed Project - Freeway Analysis—P.M. Peak

			Northbound / Eastbound												Southbound / Westbound										
			2038 NEPA Baseline					2038 With Proposed Project							2038 NEPA Baseline					2038 With Proposed Project						
Freeway	Location	Cap.	Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS	Change in D/C	Sign. Impt?	Vol	Density	LOS	D/C[1]	LOS	Vol	Density	LOS	D/C[1]	LOS	Change in D/C	Sign. Impt?
#1 SR-47	Vincent Thomas Bridge [12]	4,700	4,585	52.8	F	0.98	E	4,649	54.8	F	0.99	E	0.01	No	3,277	31.4	D	-		3,305	31.6	D	-		-	No
#2 SR-47/SR-103	Commodore Schuyler Heim Bridge [12]	6,750	2,079	13.3	B	-		2,135	13.6	B	-		-	No	1,870	11.9	B	-		1,914	12.2	B	-		-	No
#3 I-110	South of C Street (CMP monitoring station—south of C Street)	9,400	5,232	21.2	C	-		5,273	21.3	C	-		-	No	5,460	22.1	C	-		5,476	22.2	C	-		-	No
#4 I-110	North of 223rd Street [12]	9,400	6,809	28.5	D	-		6,833	28.7	D	-		-	No	8,089	26.7	D	-		8,102	26.8	D	-		-	No
#5 I-110	North of I-405 [12]	11,750	9,976	36.2	E	0.85	D	9,989	36.3	E	0.85	D	0.00	No	10,814	42.1	E	0.92	D	10,822	42.1	E	0.92	D	0.00	No
#6 I-710	North of PCH (CMP monitoring station—north of the junction of SR-1 [PCH], Willow Street)	6,750	5,476	35.2	E	0.81	D	5,550	35.8	E	0.82	D	0.01	No	6,020	40.2	E	0.89	D	6,080	40.8	E	0.90	D	0.01	No
#7 I-710	North of I-405 (CMP monitoring station—north of the junction of I-405, south of Del Amo)	9,000	8,059	40.4	E	0.90	D	8,131	41.0	E	0.90	D	0.00	No	6,600	31.6	D	-		6,659	31.9	D	-		-	No
#8 I-710	North of Alondra Boulevard [12]	11,750	8,550	28.7	D	-		8,614	29.0	D	-		-	No	6,790	22.0	C	-		6,849	22.2	C	-		-	No
#9 I-710	North of I-105 and north of Firestone Boulevard (CMP monitoring station)	9,400	8,462	40.3	E	0.90	D	8,510	40.7	E	0.91	D	0.01	No	6,668	27.8	D	-		6,708	28.0	D	-		-	No
#10 I-710	North of Florence Avenue[12]	9,400	8,566	41.2	E	0.91	D	8,612	41.7	E	0.92	D	0.01	No	6,187	25.3	C	-		6,225	25.5	C	-		-	No
#11 I-405	Between I-110 and I-710 (CMP monitoring station—Santa Fe Avenue)	11,750	9,687	34.4	D	-		9,687	34.4	D	-		-	No	11,211	45.5	F	0.95	E	11,211	45.5	F	0.95	E	0.00	No
#12 SR-91	West of I-710 (CMP monitoring station—east of Alameda Street/Santa Fe Avenue interchange)	14,100	6,735	18.2	C	-		6,735	18.2	C	-		-	No	8,082	22.2	C	-		8,082	13.4	C	-		-	No

Notes: Freeway operation conditions based on the methodology in the 2010 HCM where level of service is based on density (passenger car per mile per lane).
[1]Per Caltrans traffic impact study guidelines, Caltrans targets maintaining LOS between C and D; for segments where 2010 HCM LOS is E or F, D/C was used to determine impact significance per CMP guidelines.
[12]Non-CMP location

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3.2.6 Changes Made to Section 3.10, Noise

Section 3.10.4.3, Page 3.10-27

Revise mitigation measure MM NOI-2, as follows:

MM NOI-2: Utilize Temporary Noise Attenuation Curtain Adjacent to Pile-Driving Equipment. If under MM NOI-1 the reduced pile driving noise exceeds 103 dBA at 50 feet from the pile driver, u~~U~~tilize temporary noise attenuation curtain suitable for pile driving equipment as needed. This noise attenuation device should be installed directly between the equipment and the nearest noise sensitive receptor to the construction site.

Section 3.10.4.5, Page 3.10-59

Revise mitigation measure MM NOI-2, as follows:

Mitigation Measure	**MM NOI-2: Utilize Temporary Noise Attenuation Curtain Adjacent to Pile Driving Equipment.** If under MM NOI-1 the reduced pile driving noise exceeds 103 dBA at 50 feet from the pile driver, u~~U~~tilize temporary noise attenuation skirt suitable for pile driving as needed. This noise attenuation device should be installed directly between the equipment and the nearest noise sensitive receptor to the construction site.

3.2.7 Changes Made to Chapter 4, Cumulative Analysis

Section 4.2.2.5, Page 4-38

Revise paragraph under "Contribution of the Proposed Project (Prior to Mitigation)," as follows:

Proposed Project operational emissions would exceed SCAQMD significance thresholds for NO_X in 2019~~, 2033, and 2038~~, and for CO and VOC in 2033 and 2038 under CEQA. Operational emissions would also exceed SCAQMD significance thresholds for NO_X in 2019, 2026, 2033, and 2038, and for CO, VOC, and $PM_{2.5}$ in 2033 and 2038 under NEPA. These impacts would combine with impacts from concurrent related projects discussed above, which would already be cumulatively significant. As a result, without mitigation, proposed Project operational emissions would make a cumulatively considerable contribution to a significant cumulative impact for NO_X, CO, and VOC under CEQA, and for NO_X, CO, VOC, and $PM_{2.5}$ under NEPA.

Section 4.2.2.5, Pages 4-38 to 4-39

Revise paragraphs under "Contribution of the Alternatives," as follows:

Alternative 1 operational emissions would exceed SCAQMD significance thresholds for NO_X in 2019~~, 2033, and 2038~~; and CO and VOC in 2033 and 2038 under CEQA. These impacts would combine with impacts from concurrent related projects, which would be cumulatively significant. As a result, without mitigation, Alternative 1 impacts would make a cumulatively considerable contribution to a significant cumulative impact for

NO_X, CO, and VOC under CEQA. Alternative 1 would have the same conditions as the NEPA baseline, therefore there would be no impacts under NEPA.

Alternative 2 operational emissions would exceed SCAQMD significance thresholds for NO_X in 2019~~, 2033, and 2038~~; and CO and VOC in 2033 and 2038 under CEQA. These impacts would combine with impacts from concurrent related projects, which would be cumulatively significant. As a result, without mitigation, Alternative 2 impacts would make a cumulatively considerable contribution to a significant cumulative impact for NOx, CO, and VOC under CEQA. Since NEPA requires the evaluation of a No Federal Action Alternative and not a No Project Alternative, no cumulative impact determination under NEPA is made for Alternative 2.

Alternative 3 operational emissions would exceed SCAQMD significance thresholds for ~~NO_X,~~ CO~~,~~ and VOC in 2033 and 2038 under CEQA. Operational emissions would exceed SCAQMD significance thresholds for NO_X in 2019, 2026, 2033, and 2038; and for CO, VOC, and $PM_{2.5}$ in 2033 and 2038 under NEPA. These impacts would combine with impacts from concurrent related projects, which would be cumulatively significant. As a result, without mitigation, Alternative 3 operational emissions would make a cumulatively considerable contribution to a significant cumulative impact for ~~NO_X,~~ CO~~,~~ and VOC under CEQA; and for NO_X, CO, VOC, and $PM_{2.5}$ under NEPA.

Alternative 4 operational emissions would exceed SCAQMD significance thresholds for ~~NO_X and~~ CO in 2033 and 2038 under CEQA. Operational emissions would exceed SCAQMD significance thresholds for NO_X in 2019, 2026, 2033, and 2038 under NEPA. These impacts would combine with impacts from concurrent related projects, which would be cumulatively significant. As a result, without mitigation, Alternative 4 operational emissions would make a cumulatively considerable contribution to a significant cumulative impact for ~~NO_X and~~ CO under CEQA; and for NO_X under NEPA.

Alternative 5 operational emissions would exceed SCAQMD significance thresholds for NO_X, in 2019~~, 2033, and 2038~~; and for CO, and VOC in 2033 and 2038 under CEQA. Operational emissions would exceed SCAQMD significance thresholds for NO_X in 2019, 2026, 2033, and 2038; for CO and $PM_{2.5}$ in 2033 and 2038, and for VOC in 2026, 2033, and 2038 under NEPA. These impacts would combine with impacts from concurrent related projects, which would be cumulatively significant. As a result, without mitigation, Alternative 5 operational emissions would make a cumulatively considerable contribution to a significant cumulative impact for NO_X, CO, and VOC under CEQA; and for NO_X, CO, VOC, and $PM_{2.5}$ under NEPA.

Section 4.2.2.5, Pages 4-39 to 4-40

Revise first three paragraphs under "Mitigation Measures and Residual Cumulative Impacts," as follows:

After mitigation (measures MM AQ-6 and MM AQ-7), proposed Project NOx emissions in 2019~~, 2033, and 2038~~ would be reduce*d* to a less than significant level; however, operational emissions would continue to exceed SCAQMD significance thresholds for CO, and VOC in 2033 and 2038 under CEQA. Proposed Project operational emissions for NOx in 2019, VOC in 2026, and $PM_{2.5}$ in 2033 and 2038 would be reduced to a less than significant level; however, operational emissions would continue to exceed SCAQMD significance thresholds for NO_X in 2026, 2033, and 2038; for CO and VOC in

2033 and 2038 under NEPA. These impacts would combine with impacts from concurrent related projects, which would be cumulatively significant. Therefore, after mitigation, the proposed Project would make a cumulatively considerable and unavoidable contribution to a significant cumulative impact for CO and VOC emissions under CEQA; and for NO_X, CO, and VOC under NEPA.

Alternative 1 operational emissions, with mitigation measures MM AQ-6 and MM AQ-7, would continue to exceed the SCAQMD significance thresholds for CO and VOC in 2033 and 2038. These impacts would combine with impacts from concurrent related projects, which would be cumulatively significant. Therefore, after mitigation, Alternative 1 would make a cumulatively considerable and unavoidable contribution to a significant cumulative impact for CO and VOC emissions under CEQA. Alternative 1 would have the same conditions as the NEPA baseline, therefore there would be no impacts under NEPA.

Alternative 2 operational emissions would exceed the SCAQMD significance thresholds for NOx in 2019~~, 2033, and 2038~~ and CO and VOC in 2033 and 2038. These impacts would combine with impacts from concurrent related projects, which would be cumulatively significant. Therefore, Alternative 2 would make a cumulatively considerable and unavoidable contribution to a significant cumulative impact for NOx, CO and VOC emissions under CEQA. Since NEPA requires the evaluation of a No Federal Action Alternative and not a No Project Alternative, no cumulative impact determination under NEPA is made for Alternative 2.

3.2.8 Changes Made to Chapter 6, Comparison of Alternatives

Section 6.2.2, Page 6-5, Table 6-2

Revise Table 6-2, as follows:

Table 6-2: Summary of CEQA Significance Analysis by Alternative

Environmental Resource Area	Proposed Project	Alternative				
		1	2	3	4	5
Air Quality and Meteorology	S	S	S	S	S	S
Biological Resources	S	S	S	S	S	S
Cultural Resources	S	S	N	S	L	S
Greenhouse Gas Emissions	S	S	S	S	S	S
~~Groundwater and Soils~~	~~M~~	~~M~~	~~N~~	~~M~~	~~L~~	~~M~~
Noise	M	L	L	M	M	M

Notes:
The analysis includes project-level impacts, not cumulative effects.
S = Unavoidable significant impacts
M = Significant but mitigable impact
L = Less than significant impact (not significant)
N = No impact

Section 6.2.2, Page 6-7

Delete the first paragraph on page 6-7, as follows:

~~For groundwater and soils, the proposed Project and Alternatives 1, 3 and 5 were determined to result in less-than-significant impacts with the incorporation of mitigation measures. The impact is associated with the potential to expose construction personnel, and potentially existing operations personnel, to previously unknown or undocumented soil and/or groundwater contamination as a result of grading, excavation, and other construction-related activities occurring at the 22-acre backlands expansion area. Because no backland improvements would occur under Alternatives 2 and 4, these alternatives would have substantially less of an impact. Backland improvements would occur under Alternatives 1, 3 and 5, similar to the proposed Project. As such, the potential for groundwater and soils impacts under Alternatives 1, 3 and 5 would be equal to those for the proposed Project. Alternatives 2 and 4 do not involve excavation in the 22-acre expansion area, and are deemed to be superior to the others.~~

3.2.9 Changes Made to Appendix B.1, Air Quality Regulations/Methodology and Air Quality and GHG Emission

Section 3-2, Page B1-28

Revise the first paragraph under the heading Cargo-Handling Equipment (CHE) on page B1-28, as follows:

CHE includes yard tractors, RTGs, top handlers, sidepicks, forklifts, ~~sweepers,~~ and other miscellaneous equipment. Sweepers are also used on-site, but are classified as off-road equipment by CARB. All equipment is assumed to be diesel powered with the exception of a certain number of propane-powered forklifts. The marine terminal cranes used to lift containers on and off container ships would be electric and, therefore, would have no direct emissions. Yard tractors and top handlers would operate at both the Everport Container Terminal and the Everport portion of the TICTF.

Emission Worksheets

Appendix B1 includes a compilation of emission worksheets that are generated from air quality modeling efforts. The following new sheets are added which account for the change in overall dispersion concentration relative to each receptor in each year in each alternative under both CEQA and NEPA.

Adjustments to Convert Unmitigated Peak Daily Concentrations Without Tier 3 OGV Included, to With Tier 3 OGV Included

Alt1			NP			Alt3			Alt4			Alt5			PP		
2026	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2026	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2026	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2026	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2026	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2026	NO2 1-HR CAAQS	NO2 1-HR NAAQS
CEQA	-0.00036	-0.00034	CEQA	-0.00031	-0.00031	CEQA	-0.00103	-0.00097	CEQA	-0.00033	-0.00032	CEQA	-0.00074	-0.00069	CEQA	-0.00074	-0.00069
NEPA	0.00000	0.00000	NEPA	0.00005	0.00003	NEPA	-0.00067	-0.00063	NEPA	0.00002	0.00002	NEPA	-0.00038	-0.00035	NEPA	-0.00038	-0.00035
2033	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2033	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2033	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2033	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2033	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2033	NO2 1-HR CAAQS	NO2 1-HR NAAQS
CEQA	-0.00139	-0.00126	CEQA	-0.00139	-0.00126	CEQA	-0.00399	-0.00377	CEQA	-0.00097	-0.00094	CEQA	-0.00366	-0.00345	CEQA	-0.00366	-0.00345
NEPA	0.00000	0.00000	NEPA	0.00000	0.00000	NEPA	-0.00260	-0.00252	NEPA	0.00042	0.00031	NEPA	-0.00227	-0.00220	NEPA	-0.00227	-0.00219
2038	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2038	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2038	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2038	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2038	NO2 1-HR CAAQS	NO2 1-HR NAAQS	2038	NO2 1-HR CAAQS	NO2 1-HR NAAQS
CEQA	-0.00209	-0.00188	CEQA	-0.00209	-0.00188	CEQA	-0.00579	-0.00547	CEQA	-0.00135	-0.00132	CEQA	-0.00547	-0.00517	CEQA	-0.00547	-0.00517
NEPA	0.00000	0.00000	NEPA	0.00000	0.00000	NEPA	-0.00370	-0.00359	NEPA	0.00074	0.00057	NEPA	-0.00338	-0.00329	NEPA	-0.00338	-0.00329
Peak	NO2 1-HR CAAQS	NO2 1-HR NAAQS	Peak	NO2 1-HR CAAQS	NO2 1-HR NAAQS	Peak	NO2 1-HR CAAQS	NO2 1-HR NAAQS	Peak	NO2 1-HR CAAQS	NO2 1-HR NAAQS	Peak	NO2 1-HR CAAQS	NO2 1-HR NAAQS	Peak	NO2 1-HR CAAQS	NO2 1-HR NAAQS
CEQA	0.0000	0.0000	CEQA	0.0000	0.0000	CEQA	0.0000	0.0000	CEQA	-0.0010	-0.0009	CEQA	0.0000	0.0000	CEQA	0.0000	0.0000
NEPA	0.0000	0.0000	NEPA	0.0000	0.0000	NEPA	-0.0037	-0.0036	NEPA	0.0000	0.0006	NEPA	-0.0034	-0.0033	NEPA	-0.0034	-0.0033

	CEQA			CEQA			CEQA			CEQA			CEQA			CEQA	
	CAAQS Peak Year	NAAQS Peak Year		CAAQS Peak Year	NAAQS Peak Year		CAAQS Peak Year	NAAQS Peak Year		CAAQS Peak Year	NAAQS Peak Year		CAAQS Peak Year	NAAQS Peak Year		CAAQS Peak Year	NAAQS Peak Year
Alt1	2019	2019	Alt1	2019	2019	Alt1	2019	2019	Alt1	2019	2019	Alt1	2019	2019	Alt1	2019	2019
NP	2019	2019	NP	2019	2019	NP	2019	2019	NP	2019	2019	NP	2019	2019	NP	2019	2019
Alt3	2019	2019	Alt3	2019	2019	Alt3	2019	2019	Alt3	2019	2019	Alt3	2019	2019	Alt3	2019	2019
Alt4	2033	2033	Alt4	2033	2033	Alt4	2033	2033	Alt4	2033	2033	Alt4	2033	2033	Alt4	2033	2033
Alt5	2019	2019	Alt5	2019	2019	Alt5	2019	2019	Alt5	2019	2019	Alt5	2019	2019	Alt5	2019	2019
PP	2019	2019	PP	2019	2019	PP	2019	2019	PP	2019	2019	PP	2019	2019	PP	2019	2019
	NEPA			NEPA			NEPA			NEPA			NEPA			NEPA	
	CAAQS Peak Year	NAAQS Peak Year		CAAQS Peak Year	NAAQS Peak Year		CAAQS Peak Year	NAAQS Peak Year		CAAQS Peak Year	NAAQS Peak Year		CAAQS Peak Year	NAAQS Peak Year		CAAQS Peak Year	NAAQS Peak Year
Alt1	-	-	Alt1	-	-	Alt1	-	-	Alt1	-	-	Alt1	-	-	Alt1	-	-
NP	-	-	NP	-	-	NP	-	-	NP	-	-	NP	-	-	NP	-	-
Alt3	2038	2038	Alt3	2038	2038	Alt3	2038	2038	Alt3	2038	2038	Alt3	2038	2038	Alt3	2038	2038
Alt4	2019	2038	Alt4	2019	2038	Alt4	2019	2038	Alt4	2019	2038	Alt4	2019	2038	Alt4	2019	2038
Alt5	2038	2038	Alt5	2038	2038	Alt5	2038	2038	Alt5	2038	2038	Alt5	2038	2038	Alt5	2038	2038
PP	2038	2038	PP	2038	2038	PP	2038	2038	PP	2038	2038	PP	2038	2038	PP	2038	2038

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	2026_ALT1_CAAQS	2026_ALT1_NAAQS	2026_NP_CAAQS	2026_NP_NAAQS	2026_ALT3_CAAQS	2026_ALT3_NAAQS	2026_ALT4_CAAQS	2026_ALT4_NAAQS	2026_ALT5_CAAQS	2026_ALT5_NAAQS	2026_PP_CAAQS	2026_PP_NAAQS	2033_ALT1_CAAQS	2033_ALT1_NAAQS	2033_NP_CAAQS	2033_NP_NAAQS	2033_ALT3_CAAQS	2033_ALT3_NAAQS
380450	3731350	66.18%	14.525606	14.03966	14.52561	14.03966	14.72718	14.23531	15.51738	14.99939	14.95766	14.45894	14.95766	14.45894	19.75864	19.09341	19.75864	19.09341	19.95483	19.28367
380950	3731350	67.45%	16.21635	15.87938	16.21635	15.87938	16.46727	16.12823	17.34637	16.98883	16.71573	16.37077	16.71573	16.37077	22.00597	21.5419	22.00597	21.5419	22.24106	21.77405
381450	3731350	65.54%	18.679038	17.93935	18.67904	17.93935	18.99641	18.24369	20.00484	19.21264	19.2706	18.5084	19.2706	18.5084	25.29541	24.29204	25.29541	24.29204	25.58336	24.56852
381950	3731350	65.55%	22.110628	21.16056	22.11063	21.16056	22.51073	21.54202	23.70139	22.68211	22.82641	21.84581	22.82641	21.84581	29.89442	28.61028	29.89442	28.61028	30.2503	28.95024
384450	3731350	56.86%	19.303718	18.28066	19.30372	18.28066	19.53439	18.49111	20.62875	19.53063	19.98319	18.92597	19.98319	18.92597	26.05794	24.67811	26.05794	24.67811	26.32074	24.92338
380450	3731850	62.95%	15.889925	15.53135	15.88993	15.53135	16.12938	15.76788	16.99078	16.60982	16.37269	16.00557	16.37269	16.00557	21.58135	21.08731	21.58135	21.08731	21.80715	21.30982
380950	3731850	56.01%	18.285919	17.81412	18.28592	17.81412	18.58822	18.10916	19.57608	19.0717	18.85814	18.37272	18.85814	18.37272	24.78331	24.14086	24.78331	24.14086	25.05963	24.41061
381450	3731850	63.64%	20.196706	19.56102	20.19671	19.56102	20.55482	19.90803	21.64303	20.96198	20.8449	20.18888	20.8449	20.18888	27.32317	26.46291	27.32317	26.46291	27.64356	26.77328
383450	3731850	67.55%	17.825878	17.49912	17.82588	17.49912	18.05613	17.72901	19.05525	18.7086	18.43379	18.09607	18.43379	18.09607	24.09342	23.64944	24.09342	23.64944	24.34078	23.89413
383950	3731850	63.55%	16.289656	15.88249	16.28966	15.88249	16.46165	16.05254	17.38984	16.95702	16.85467	16.43403	16.85467	16.43403	22.02116	21.46791	22.02116	21.46791	22.23017	21.67296
380450	3732350	69.13%	16.73045	15.90872	16.73045	15.90872	16.99474	16.15643	17.90031	17.01831	17.24679	16.39866	17.24679	16.39866	22.69802	21.58776	22.69802	21.58776	22.94341	21.81905
380950	3732350	58.58%	18.797496	18.37339	18.7975	18.37339	19.11558	18.68386	20.13074	19.67619	19.39245	18.9544	19.39245	18.9544	25.45762	24.88463	25.45762	24.88463	25.7466	25.16686
381450	3732350	59.16%	21.127573	20.6715	21.12757	20.6715	21.50899	21.04573	22.64674	22.15886	21.81079	21.34081	21.81079	21.34081	28.56743	27.94842	28.56743	27.94842	28.9069	28.28115
381950	3732350	67.36%	23.818136	21.90152	23.81814	21.90152	24.26384	22.30118	25.54529	23.48204	24.60065	22.61881	24.60065	22.61881	32.16936	29.59191	32.16936	29.59191	32.56219	29.94767
382450	3732350	66.43%	22.269601	21.94784	22.2696	21.94784	22.65895	22.33437	23.86781	23.52507	23.00751	22.67583	23.00751	22.67583	30.08175	29.59982	30.08175	29.59982	30.43678	29.95054
383450	3732350	68.74%	15.652286	15.34197	15.65229	15.34197	15.8367	15.52716	16.71804	16.38998	16.1808	15.86103	16.1808	15.86103	21.17816	20.75322	21.17816	20.75322	21.38563	20.95888
383950	3732350	61.71%	14.492123	14.12611	14.49212	14.12611	14.63548	14.26946	15.46209	15.07418	14.98726	14.60923	14.98726	14.60923	19.6132	19.11089	19.6132	19.11089	19.79289	19.28782
384450	3732350	60.93%	13.627314	13.05291	13.62731	13.05291	13.74954	13.16873	14.53059	13.91789	14.09199	13.50003	14.09199	13.50003	18.45256	17.65226	18.45256	17.65226	18.61515	17.80745
380450	3732850	58.63%	17.262173	16.71282	17.26217	16.71282	17.54271	16.98308	18.47615	17.88708	17.80021	17.23308	17.80021	17.23308	23.40336	22.6606	23.40336	22.6606	23.66134	22.90972
380950	3732850	64.12%	19.680105	18.94072	19.68011	18.94072	20.02183	19.26599	21.08332	20.28844	20.30776	19.54362	20.30776	19.54362	26.63759	25.64117	26.63759	25.64117	26.94537	25.93547
381450	3732850	56.97%	22.886485	21.92436	22.88649	21.92436	23.31404	22.33178	24.54366	23.35937	23.63228	22.63819	23.63228	22.63819	30.9246	29.43938	30.9246	29.43938	31.3005	29.79537
382450	3732850	67.70%	19.736178	19.26893	19.73618	19.26893	20.06305	19.58958	21.13925	20.64004	20.38685	19.90498	20.38685	19.90498	26.67824	26.04378	26.67824	26.04378	26.98315	26.34254
383950	3732850	65.45%	13.062942	12.65886	13.06294	12.65886	13.1862	12.7809	13.9309	13.49667	13.5017	13.08059	13.5017	13.08059	17.698755	17.13845	17.69876	17.13845	17.8563	17.2927
384450	3732850	62.51%	12.388664	11.85744	12.38866	11.85744	12.49444	11.95946	13.20429	12.63901	12.80487	12.25703	12.80487	12.25703	16.791973	16.06884	16.79197	16.06884	16.9359	16.20722
384950	3732850	57.74%	11.857838	11.45635	11.85784	11.45635	11.95219	11.54912	12.63346	12.20747	12.25492	11.8422	12.25492	11.8422	16.079513	15.52941	16.07951	15.52941	16.21364	15.66021
380450	3733350	58.82%	17.571851	16.89458	17.57185	16.89458	17.86214	17.17196	18.81169	18.08548	18.12257	17.42381	18.12257	17.42381	23.81354	22.89752	23.81354	22.89752	24.07918	23.15204
380950	3733350	55.08%	20.483835	20.09697	20.48384	20.09697	20.84922	20.4576	21.95212	21.53915	21.14089	20.74195	21.14089	20.74195	27.60856	27.10444	27.60856	27.10444	27.9329	27.42405
381450	3733350	63.32%	24.093483	23.39956	24.09348	23.39956	24.55677	23.85107	25.84887	25.10586	24.88463	24.16901	24.88463	24.16901	32.534311	31.59408	32.53431	31.59408	32.93775	31.9869
382450	3733350	67.03%	19.146625	18.46461	19.14663	18.46461	19.46431	18.77104	20.50798	19.77772	19.77733	19.07367	19.77733	19.07367	25.881722	24.95812	25.88172	24.95812	26.17782	25.24389
382950	3733350	74.30%	15.033746	14.38016	15.03375	14.38016	15.23357	14.57147	16.0688	15.37061	15.52827	14.85419	15.52827	14.85419	20.354638	19.4676	20.35464	19.4676	20.56249	19.66673
383450	3733350	71.98%	13.428949	12.62787	13.42895	12.62787	13.57974	12.76618	14.33536	13.47814	13.87283	13.04622	13.87283	13.04622	18.194811	17.10961	18.19481	17.10961	18.36716	17.27021
383950	3733350	65.22%	12.216862	11.6251	12.21686	11.6251	12.33151	11.73443	13.02659	12.39589	12.62202	12.01105	12.62202	12.01105	16.563788	15.76046	16.56379	15.76046	16.7098	15.89959
389450	3733350	51.23%	8.29123	8.022448	8.29123	8.022448	8.329674	8.061335	8.811837	8.527696	8.558917	8.282702	8.558917	8.282702	11.281432	10.91209	11.28143	10.91209	11.35971	10.98889
389950	3733350	50.80%	7.889909	7.397348	7.889909	7.397348	7.925011	7.431348	8.38297	7.859766	8.140274	7.63011	8.140274	7.63011	10.745615	10.0783	10.74562	10.0783	10.81853	10.1468
380450	3733850	44.59%	18.232934	17.58488	18.23293	17.58488	18.54449	17.88611	19.52768	18.83422	18.80844	18.14015	18.80844	18.14015	24.55779	23.81556	24.55779	23.81556	24.83715	24.08749
380950	3733850	47.80%	21.776423	20.89705	21.77642	20.89705	22.1775	21.28136	23.34802	22.40455	22.48188	21.57294	22.48188	21.57294	29.43718	28.25085	29.43718	28.25085	29.79124	28.59012
381450	3733850	57.07%	26.377714	25.9051	26.37771	25.9051	26.90504	26.42554	28.31487	27.80998	27.24951	26.76335	27.24951	26.76335	35.594175	34.95062	35.59418	34.95062	36.04691	35.39686
382450	3733850	57.02%	18.027064	17.11186	18.02706	17.11186	18.32275	17.38872	19.30591	18.32332	18.61921	17.6743	18.61921	17.6743	24.374322	23.13863	24.37432	23.13863	24.65108	23.39954
382950	3733850	74.24%	14.448148	13.85591	14.44815	13.85591	14.64231	14.0407	15.4434	14.80963	14.92058	14.30948	14.92058	14.30948	19.566692	18.76425	19.56669	18.76425	19.76693	18.95572
383450	3733850	71.64%	12.741974	12.16172	12.74197	12.16172	12.88602	12.29932	13.60157	12.98219	13.15955	12.56007	13.15955	12.56007	17.271032	16.48492	17.27103	16.48492	17.43442	16.64091
383950	3733850	72.82%	11.57812	11.12345	11.57812	11.12345	11.68897	11.2301	12.34563	11.86104	11.9576	11.48843	11.9576	11.48843	15.70589	15.08823	15.70589	15.08823	15.8445	15.22154
384950	3733850	63.47%	10.33823	10.00798	10.33823	10.00798	10.41549	10.08255	11.00894	10.65731	10.67749	10.33701	10.67749	10.33701	14.036687	13.58714	14.03669	13.58714	14.14981	13.69667
388450	3733850	51.31%	8.958891	8.407189	8.958891	8.407189	9.0036	8.450537	9.525474	8.938527	9.254355	8.680234	9.254355	8.680234	12.174728	11.43312	12.17473	11.43312	12.26208	11.51495
388950	3733850	51.24%	8.657408	8.253192	8.657408	8.253192	8.699127	8.293157	9.202907	8.773368	8.939666	8.522279	8.939666	8.522279	11.772919	11.22306	11.77292	11.22306	11.85594	11.30233
389450	3733850	49.47%	8.425748	8.008948	8.425748	8.008948	8.464357	8.045571	8.954914	8.511861	8.69919	8.268775	8.69919	8.268775	11.461826	10.89509	11.46183	10.89509	11.54142	10.97068
389950	3733850	49.71%	7.955426	7.612768	7.955426	7.612768	7.989525	7.646464	8.452291	8.088945	8.2098	7.856139	8.2098	7.856139	10.831555	10.36443	10.83156	10.36443	10.90481	10.43504
380450	3734350	42.89%	19.153302	18.47509	19.1533	18.47509	19.49112	18.80208	20.52251	19.79654	19.76403	19.06418	19.76403	19.06418	25.92129	25.00251	25.92129	25.00251	26.22344	25.29457
380950	3734350	42.04%	23.518485	22.84605	23.51849	22.84605	23.97105	23.28582	25.23096	24.50967	24.28682	23.59255	24.28682	23.59255	31.766367	30.85738	31.76637	30.85738	32.15951	31.23943
381450	3734350	56.93%	29.094059	27.64372	29.09406	27.64372	29.69887	28.21458	31.24826	29.68781	30.06139	28.56262	30.06139	28.56262	39.233129	37.28031	39.23313	37.28031	39.74499	37.76468
382950	3734350	65.18%	13.926087	13.32362	13.92609	13.32362	14.11335	13.49972	14.88506	14.23876	14.37996	13.75705	14.37996	13.75705	18.86263	18.05027	18.86263	18.05027	19.05546	18.23308
383450	3734350	70.72%	12.206786	11.85583	12.20679	11.85583	12.34475	11.98943	13.02921	12.65446	12.60338	12.24144	12.60338	12.24144	16.552971	16.07642	16.55297	16.07642	16.70878	16.22764
383950	3734350	66.74%	11.057455	10.71773	11.05746	10.71773	11.1637	10.82299	11.7898	11.42912	11.41692	11.06613	11.41692	11.06613	15.005675	14.54328	15.00568	14.54328	15.13765	14.67231
384950	3734350	65.81%	9.962299	9.771561	9.962299	9.771561	10.03554	9.845442	10.60681	10.4053	10.28604	10.08968	10.28604	10.08968	13.533838	13.27222	13.53384	13.27222	13.64163	13.37906
386450	3734350	61.28%	9.154761	8.846733	9.154761	8.846733	9.205051	8.895388	9.735552	9.408124	9.452434	9.134731	9.452434	9.134731	12.447041	12.02748	12.44704	12.02748	12.53775	12.11523
387950	3734350	55.52%	8.804638	8.477679	8.804638	8.477679	8.846019	8.524995	9.359024	9.01822	9.092702	8.759769	9.092702	8.759769	11.971604	11.52257	11.9716	11.52257	12.05574	11.61055
389950	3734350	53.01%	7.823904	7.419914	7.823904	7.419914	7.855118	7.450672	8.311172	7.882476	8.074704	7.656666	8.074704	7.656666	10.65262	10.10416	10.65262	10.10416	10.72364	10.17187
380450	3734850	50.21%	20.148173	19.45832	20.14817	19.45832	20.51629	19.81432	21.59847	20.85945	20.795	20.08338	20.795	20.08338	27.25037	26.31621	27.25037	26.31621	27.57539	26.63032
380950	3734850	41.96%	24.612534	23.51568	24.61253	23.51568	25.09697	23.97787	26.41274	25.23494	25.41866	24.28511	25.41866	24.28511	33.232645	31.75372	33.23265	31.75372	33.64987	32.15185
381450	3734850	54.39%	27.912178	27.07852	27.91218	27.07852	28.48904	27.63809	29.97638	29.08091	28.83962	27.97797	28.83962	27.97797	37.642859	36.5192	37.64286	36.5192	38.13217	36.99375
383450	3734850	71.71%	11.825766	11.60419	11.82577	11.60419	11.95769	11.7356	12.62041	12.3853	12.20694	11.97834	12.20694	11.97834	16.043822	15.74176	16.04382	15.74176	16.1934	15.88944
383950	3734850	68.62%	10.746666	10.36167	10.74667	10.36167	10.85375	10.46635	11.46013	11.05031	11.0931	10.69491	11.0931	10.69491	14.587728	14.0659	14.58773	14.0659	14.71731	14.1914
387450	3734850	59.71%	8.515066	8.192284	8.515066	8.192284	8.554409	8.2302	9.050052	8.707189	8.791323	8.458627	8.791323	8.458627	11.583269	11.14297	11.58327	11.14297	11.66384	11.22063
388450	3734850	58.12%	8.141813	7.889122	8.141813	7.889122	8.176133	7.928775	8.650746	8.388387	8.404797	8.148983	8.404797	8.148983	11.080066	10.73709	11.08007	10.73709	11.15525	10.81152
388950	3734850	57.47%	7.976107	7.51516	7.976107	7.51516	8.008531	7.548025	8.474102	7.985017	8.234524	7.755603	8.234524	7.755603	10.853679	10.23139	10.85368	10.23139	10.92689	10.30094
389450	3734850	57.35%	7.655523	7.328322	7.655523	7.328322	7.685368	7.357587	8.131836	7.78475	7.90091	7.563217	7.90091	7.563217	10.423809	9.977833	10.42381	9.977833	10.49296	10.04437
380450	3735350	48.26%	20.131258	19.82853	20.13126	19.82853	20.50247	20.19832	21.5829	21.26182	20.77833	20.468	20.77833	20.468	27.224005	26.80743	27.22401	26.80743	27.55044	27.13148
380950	3735350	54.36%	23.595834	23.10869	23.59583	23.10869	24.06178	23.56648	25.32299	24.80131	24.36961	23.86708	24.36961	23.86708	31.856987	31.19704	31.85699	31.19704	32.25789	31.59061
381450	3735350	58.82%	25.3553	24.76517	25.3553	24.76517	25.87091	25.26952	27.2235	26.59056	26.19392	25.58472	26.19392	25.58472	34.2081	33.41039	34.2081	33.41039	34.6476	33.84012
381950	3735350	64.34%	25.300424	24.60594	25.30042	24.60594	25.8118	25.10373	27.16372	26.41849	26.14119	25.42405	26.14119	25.42405	34.127396	33.18972	34.1274	33.18972	34.56532	33.61583
382950	3735350	67.28%	14.271902	13.43746	14.2719	13.43746	14.4831	13.63322	15.26709	14.37201	14.70233	13.8724	14.70233	13.8724	19.281436	18.12383	19.28144	18.12383	19.48752	18.37815
383950	3735350	74.59%	10.985575	10.50012	10.98558	10.50012	11.10487	10.61335	11.72111	11.2026	11.33824	10.83719	11.33824	10.83719	14.908993	14.25068	14.90899	14.25068	15.04602	14.38126
384450	3735350	72.11%	10.170511	9.897463	10.17051	9.897463	10.26518	9.991829	10.8406	10.55134	10.49646	10.2155	10.49646	10.2155	13.813897	13.43982	13.8139	13.43982	13.93287	13.55687
384950	3735350	69.13%	9.494057	9.293223	9.494057	9.293223	9.571035	9.371103	10.11152	9.899856	9.797221	9.59167	9.797221	9.59167	12.904572	12.62642	12.90457	12.62642	13.00979	12.73099
387950	3735350	61.18%	7.954813	7.601873	7.954813	7.601873	7.987691	7.633874	8.451378	8.076651	8.21099	7.846217	8.21099	7.846217	10.827612	10.34783	10.82761	10.34783	10.90061	10.41777
388450	3735350	59.63%	7.796824	7.466801	7.796824	7.466801	7.826253	7.498431	8.281488	7.933158	8.047441	7.706404	8.047441	7.706404	10.615323	10.1647	10.61532	10.1647	10.68539	10.23343
388950	3735350	60.09%	7.6952	7.345574	7.6952	7.345574	7.72406	7.376003	8.173485	7.803785	7.942787	7.580929	7.942787	7.580929	10.476542	10.0009	10.47654	10.0009	10.54566	10.0681
389450	3735350	58.87%	7.326497	7.086239	7.326497	7.086239	7.3538	7.114769	7.780996	7.527304	7.559743	7.311927	7.559743	7.311927	9.979983	9.65118	9.979983	9.65118	10.04521	9.715342
380450	3735850	56.14%	19.648781	18.89484	19.64878	18.89484	20.01995	19.25053	21.07265	20.26336	20.28351	19.50557	20.28351	19.50557	26.559145	25.53972	26.55915	25.53972	26.88279	25.85049
380950	3735850	60.07%	21.606406	21.15182	21.60641	21.15182	22.02864	21.56788	23.18412	22.6984	22.23003	21.84384	22.23003	21.84384	29.010797	28.37975	29.0108	28.37975	29.37267	28.73517
381450	3735850	63.43%	23.440628	22.91039	23.44063	22.91039	23.91135	23.37255	25.16291	24.59565	24.2133	23.66723	24.2133	23.66723	31.634194	30.91388	31.63419	30.91388	32.03713	31.30906
382450	3735850	65.11%	20.823184	19.51836	20.82318	19.51836	21.22048	19.88555	22.33952	20.93587	21.51128	20.16256	21.51128	20.16256	28.111182	26.35485	28.11118	26.35485	28.45917	26.67829
382950	3735850	69.71%	16.243997	15.42424	16.244	15.42424	16.51431	15.67934	17.5018	16.68095	16.77489	15.9274	16.77489	15.9274	21.966519	20.66314	21.96652	20.66314	22.21734	21.09817
383450	3735850	69.54%	12.754714	12.18238	12.75471	12.18238	12.93032	12.34863	13.63445	13.02151	13.16607	12.54794	13.16607	12.54794	17.282705	16.3199	17.28271	16.3199	17.4605	16.4859
383950	3735850	67.61%	11.129192	10.48384	11.12919	10.48384	11.25907	10.60276	11.88028	11.18878	11.48585	10.808	11.48585	10.808	15.099599	13.98039	15.0996	13.98039	15.24277	14.10954
384450	3735850	70.13%	10.136687	9.743185	10.13669	9.743185	10.218	9.828284	10.80923	10.38956	10.43984	10.02192	10.43984	10.02192	13.738952	13.18896	13.73895	13.18896	13.86056	13.30555
384950	3735850	69.17%	9.439244	9.161952	9.439244	9.161952	9.521292	9.242253	10.05643	9.761805	9.739187	9.454246	9.739187	9.454246	12.829749	12.44995	12.82975	12.44995	12.9368	12.55441
385450	3735850	63.23%	8.933934	8.668085	8.933934	8.668085	9.001706	8.734274	9.511648	9.229229	9.218706	8.945494	9.218706	8.945494	12.14727	11.76924	12.14727	11.7481	12.24388	11.87733

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	*2026_ALT1_CAAQS*	*2026_ALT1_NAAQS*	*2026_NP_CAAQS*	*2026_NP_NAAQS*	*2026_ALT3_CAAQS*	*2026_ALT3_NAAQS*	*2026_ALT4_CAAQS*	*2026_ALT4_NAAQS*	*2026_ALT5_CAAQS*	*2026_ALT5_NAAQS*	*2026_PP_CAAQS*	*2026_PP_NAAQS*	*2033_ALT1_CAAQS*	*2033_ALT1_NAAQS*	*2033_NP_CAAQS*	*2033_NP_NAAQS*	*2033_ALT3_CAAQS*	*2033_ALT3_NAAQS*
385950	3735850	58.67%	8.64483	8.321882	8.64483	8.321882	8.703494	8.377898	9.199611	8.855602	8.921895	8.588497	8.921895	8.588497	11.755317	11.31667	11.75532	11.31667	11.84569	11.40343
386450	3735850	59.39%	8.227731	7.934327	8.227731	7.934327	8.276361	7.981719	8.750808	8.439216	8.491254	8.188902	8.491254	8.188902	11.193013	10.79262	11.19301	10.79262	11.27544	10.87243
386950	3735850	60.54%	8.131344	7.859734	8.131344	7.859734	8.172375	7.900371	8.643214	8.355219	8.390735	8.110646	8.390735	8.110646	11.068496	10.69777	11.0685	10.69777	11.14629	10.77349
388450	3735850	55.20%	7.43115	7.11374	7.43115	7.11374	7.459363	7.141714	7.892666	7.556144	7.668279	7.340583	7.668279	7.340583	10.121014	9.688464	10.12101	9.688464	10.18756	9.752597
388950	3735850	56.70%	7.211887	6.984407	7.211887	6.984407	7.237492	7.0115	7.658174	7.418466	7.44072	7.206937	7.44072	7.206937	9.826259	9.512967	9.826259	9.512967	9.889699	9.575723
380450	3736350	56.18%	19.125284	18.51883	19.12528	18.51883	19.48243	18.86639	20.50801	19.85933	19.74207	19.11748	19.74207	19.11748	25.855957	25.03214	25.85596	25.03214	26.16882	25.33621
380950	3736350	53.84%	20.741548	20.08931	20.74155	20.08931	21.13489	20.47253	22.24663	21.5492	21.41476	20.74351	21.41476	20.74351	28.028287	26.6493	28.02829	26.6493	28.3715	26.97551
381450	3736350	70.54%	21.79217	21.2839	21.79217	21.2839	22.21992	21.7035	23.38585	22.84197	22.50783	21.98404	22.50783	21.98404	29.421148	28.73137	29.42115	28.73137	29.79038	29.0931
382450	3736350	66.15%	19.261847	18.64011	19.26185	18.64011	19.62009	18.9864	20.65696	19.99019	19.89459	19.25313	19.89459	19.25313	26.017199	25.17626	26.0172	25.17626	26.33371	25.48252
382950	3736350	67.60%	16.191123	15.15671	16.19112	15.15671	16.46584	15.40835	17.3448	16.23282	16.719	15.6504	16.719	15.6504	21.894428	20.50038	21.89443	20.50038	22.1468	20.7337
383950	3736350	61.33%	11.365771	10.70274	11.36577	10.70274	11.50855	10.83364	12.1396	11.42871	11.72965	11.04441	11.72965	11.04441	15.414956	14.52006	15.41496	14.52006	15.56609	14.66042
384450	3736350	65.10%	10.123837	9.377926	10.12384	9.377926	10.23157	9.47181	10.79939	9.99932	10.44627	9.675392	10.44627	9.675392	13.746313	12.73979	13.74631	12.73979	13.87102	12.85215
384950	3736350	72.58%	9.180445	8.92061	9.180445	8.92061	9.26456	9.002529	9.783285	9.506773	9.471041	9.203818	9.471041	9.203818	12.477697	12.12263	12.4777	12.12263	12.58372	12.22591
385450	3736350	68.03%	8.692935	8.515032	8.692935	8.515032	8.762773	8.584579	9.257145	9.068898	8.968181	8.786114	8.968181	8.786114	11.821045	11.57527	11.82105	11.57527	11.91662	11.66973
385950	3736350	63.40%	8.302674	8.018857	8.302674	8.018857	8.360394	8.074502	8.835797	8.533687	8.566667	8.273843	8.566667	8.273843	11.293619	10.90758	11.29362	10.90758	11.3807	10.99164
386450	3736350	61.28%	8.199509	7.893305	8.199509	7.893305	8.249754	7.942033	8.721746	8.396041	8.461303	8.144545	8.461303	8.144545	11.155226	10.74007	11.15523	10.74007	11.2381	10.81986
386950	3736350	57.76%	7.894852	7.636689	7.894852	7.636689	7.936852	7.678223	8.393128	8.119203	8.146176	7.87952	8.146176	7.87952	10.746364	10.39492	10.74636	10.39492	10.82287	10.46931
387450	3736350	57.20%	7.721833	7.451078	7.721833	7.451078	7.758647	7.486541	8.206517	7.918688	7.96839	7.68882	7.96839	7.68882	10.511957	10.14373	10.51196	10.14373	10.58481	10.21397
387950	3736350	58.42%	7.530887	7.256612	7.530887	7.256612	7.562643	7.287328	8.00069	7.709237	7.771073	7.487536	7.771073	7.487536	10.255152	9.882694	10.25515	9.882694	10.3241	9.949101
388450	3736350	55.93%	7.2064	6.944405	7.2064	6.944405	7.233094	6.970831	7.653202	7.375083	7.435383	7.163883	7.435383	7.163883	9.817388	9.462548	9.817388	9.462548	9.881403	9.524343
388950	3736350	54.22%	7.054673	6.756514	7.054673	6.756514	7.079042	6.780993	7.490615	7.174504	7.278016	6.969409	7.278016	6.969409	9.61356	9.208669	9.61356	9.208669	9.675186	9.268063
380450	3736850	55.16%	18.124494	17.53986	18.12449	17.53986	18.45393	17.86191	19.4274	18.8036	18.70465	18.10317	18.70465	18.10317	24.518019	23.72127	24.51802	23.72127	24.80919	24.00501
380950	3736850	57.73%	19.099849	18.4293	19.09985	18.4293	19.4531	18.7724	20.47874	19.76186	19.71685	19.02657	19.71685	19.02657	25.821973	24.90991	25.82197	24.90991	26.13287	25.21139
381450	3736850	72.05%	19.729977	19.11913	19.72998	19.11913	20.10755	19.48486	21.16505	20.50974	20.37415	19.74371	20.37415	19.74371	26.65119	25.82552	26.65119	25.82552	26.97993	26.14407
382450	3736850	68.07%	17.897833	17.16528	17.89783	17.16528	18.22435	17.47673	19.18901	18.4024	18.48287	17.72622	18.48287	17.72622	24.185158	23.19624	24.18516	23.19624	24.47556	23.47398
382950	3736850	72.26%	15.323124	14.25431	15.32312	14.25431	15.58008	14.48726	16.4122	15.26288	15.8203	14.71565	15.8203	14.71565	20.727589	19.28828	20.72759	19.28828	20.96444	19.50532
383450	3736850	66.82%	13.298694	12.30424	13.29869	12.30424	13.49944	12.48326	14.22797	13.15898	13.72757	12.69962	13.72757	12.69962	18.008858	16.66937	18.00886	16.66937	18.20296	16.84525
383950	3736850	66.15%	11.544107	11.05677	11.54411	11.05677	11.70003	11.20337	12.33742	11.81461	11.91355	11.41018	11.91355	11.41018	15.650351	14.99231	15.65035	14.99231	15.80924	15.143
384450	3736850	59.65%	10.193106	9.630448	10.19311	9.630448	10.30999	9.737268	10.87891	10.27555	10.51748	9.935641	10.51748	9.935641	13.835682	13.0769	13.83568	13.0769	13.96532	13.19736
384950	3736850	64.81%	9.130337	8.702327	9.130337	8.702327	9.219113	8.783493	9.733106	9.274397	9.418496	8.976659	9.418496	8.976659	12.408173	11.82935	12.40817	11.82935	12.51598	11.93034
385950	3736850	68.74%	8.085042	7.898055	8.085042	7.898055	8.143361	7.955987	8.605054	8.406769	8.340266	8.147652	8.340266	8.147652	11.000188	10.7446	11.00019	10.7446	11.08565	10.82863
386450	3736850	67.15%	7.782803	7.576863	7.782803	7.576863	7.832424	7.625877	8.279205	8.060357	8.02934	7.816044	8.02934	7.816044	10.59124	10.31229	10.59124	10.31229	10.67047	10.38961
387450	3736850	69.94%	7.537078	7.230585	7.537078	7.230585	7.574568	7.266605	8.010741	7.684595	7.77615	7.458515	7.77615	7.458515	10.262812	9.848427	10.26281	9.848427	10.33439	9.916841
387950	3736850	64.33%	7.333141	7.109709	7.333141	7.109709	7.364884	7.141048	7.790778	7.553705	7.565731	7.334987	7.565731	7.334987	9.988099	9.683921	9.988099	9.683921	10.0554	9.749413
388450	3736850	58.19%	6.960413	6.748242	6.960413	6.748242	6.987553	6.775042	7.392623	7.167276	7.180753	6.960766	7.180753	6.960766	9.483191	9.19614	9.483191	9.19614	9.545518	9.256604
388950	3736850	56.64%	6.749398	6.530213	6.749398	6.530213	6.772803	6.554443	7.166226	6.93438	6.962033	6.735287	6.962033	6.735287	9.19969	8.901347	9.19969	8.901347	9.258489	8.958897
389450	3736850	55.67%	6.580922	6.401765	6.580922	6.401765	6.602387	6.424387	6.986035	6.797267	6.78697	6.603003	6.78697	6.603003	8.973665	8.726565	8.973665	8.726565	9.030077	8.782456
380450	3737350	57.87%	16.585029	16.17214	16.58503	16.17214	16.87672	16.46101	17.76956	17.3311	17.11213	16.68896	17.11213	16.68896	22.449867	21.77258	22.44987	21.77258	22.71076	22.02794
380950	3737350	63.61%	17.826167	17.2073	17.82617	17.2073	18.14942	17.52104	19.10809	18.44649	18.39983	17.76281	18.39983	17.76281	24.108527	23.26691	24.10853	23.26691	24.39507	23.54471
381450	3737350	70.61%	17.905754	17.23866	17.90575	17.23866	18.23983	17.55981	19.2013	18.48566	18.4869	17.79826	18.4869	17.79826	24.199977	23.2983	24.19998	23.2983	24.49343	23.58059
381950	3737350	78.92%	17.545129	16.81896	17.54513	16.81896	17.86795	17.12661	18.81186	18.03209	18.11571	17.36617	18.11571	17.36617	23.712644	22.73179	23.71264	22.73179	23.99824	23.00467
382450	3737350	68.61%	16.398975	15.77083	16.39898	15.77083	16.68921	16.04959	17.57514	16.90147	16.93205	16.28298	16.93205	16.28298	22.171458	21.32362	22.17146	21.32362	22.43256	21.57444
382950	3737350	70.62%	14.434183	13.68562	14.43418	13.68562	14.67231	13.90732	15.45662	14.65204	14.90017	14.12674	14.90017	14.12674	19.532552	18.52397	19.53255	18.52397	19.75331	18.73105
383450	3737350	65.58%	12.71077	12.14995	12.71077	12.14995	12.90047	12.32968	13.59694	12.99549	13.11911	12.53874	13.11911	12.53874	17.217393	16.46196	17.21739	16.46196	17.40144	16.63688
383950	3737350	73.34%	11.333488	10.54213	11.33349	10.54213	11.48747	10.67796	12.11258	11.26139	11.69502	10.87708	11.69502	10.87708	15.366657	14.30119	15.36666	14.30119	15.52284	14.44255
384450	3737350	59.78%	10.26522	9.740409	10.26522	9.740409	10.39032	9.85605	10.96084	10.39798	10.59173	10.0489	10.59173	10.0489	13.929251	13.22187	13.92925	13.22187	14.06343	13.34741
384950	3737350	63.58%	9.188943	8.788951	9.188943	8.788951	9.285155	8.878109	9.800155	9.371611	9.478692	9.06608	9.478692	9.06608	12.484055	11.94246	12.48406	11.94246	12.59589	12.04802
385450	3737350	58.48%	8.38318	8.087616	8.38318	8.087616	8.455986	8.156981	8.930334	8.61498	8.646527	8.341979	8.646527	8.341979	11.400857	10.9988	11.40086	10.9988	11.49531	11.08956
385950	3737350	64.96%	8.031241	7.71295	8.031241	7.71295	8.093547	7.771156	8.550466	8.210639	8.283803	7.955983	8.283803	7.955983	10.926289	10.4933	10.92629	10.4933	11.01317	10.57601
386950	3737350	66.60%	7.514244	7.290025	7.514244	7.290025	7.559455	7.334604	7.991668	7.753369	7.752184	7.519827	7.752184	7.519827	10.227662	9.92423	10.22766	9.92423	10.30282	9.997287
387950	3737350	64.20%	7.129635	6.915016	7.129635	6.915016	7.162322	6.94749	7.575556	7.34796	7.354975	7.133284	7.354975	7.133284	9.711466	9.419294	9.711466	9.419294	9.777647	9.483795
388450	3737350	64.51%	6.79215	6.647153	6.79215	6.647153	6.819351	6.675058	7.213948	7.060861	7.005643	6.85627	7.005643	6.85627	9.256751	9.057952	9.256751	9.057952	9.317641	9.118187
388950	3737350	60.35%	6.820907	6.588683	6.820907	6.588683	6.84524	6.612828	7.242483	6.996052	7.035409	6.794896	7.035409	6.794896	9.297592	8.982718	9.297592	8.982718	9.35728	9.040494
389450	3737350	58.02%	6.682294	6.42032	6.682294	6.42032	6.702713	6.441806	7.092783	6.815551	6.891753	6.62018	6.891753	6.62018	9.112245	8.756765	9.112245	8.756765	9.168901	8.811843
380450	3737850	60.72%	15.674867	15.0149	15.67487	15.0149	15.9463	15.2774	16.7908	16.08633	16.17101	15.49252	16.17101	15.49252	21.224778	20.32433	21.22478	20.32433	21.46884	20.55987
380950	3737850	67.08%	16.493702	16.17218	16.4937	16.17218	16.78645	16.46285	17.67493	17.33343	17.02263	16.69262	17.02263	16.69262	22.31419	21.87333	22.31419	21.87333	22.57593	22.13201
381450	3737850	66.21%	17.041895	16.03992	17.0419	16.03992	17.35255	16.32815	18.2692	17.19207	17.59257	16.55754	17.59257	16.55754	23.042211	21.6912	23.04221	21.6912	23.31743	21.94807
381950	3737850	76.97%	16.189931	15.39262	16.18993	15.39262	16.47872	15.6643	17.35162	16.49515	16.71323	15.89	16.71323	15.89	21.893592	20.81753	21.89359	20.81753	22.15191	21.06177
382450	3737850	69.99%	15.116154	14.49401	15.11615	14.49401	15.37588	14.74207	16.19381	15.52668	15.60385	14.96159	15.60385	14.96159	20.442181	19.60569	20.44218	19.60569	20.67853	19.83179
382950	3737850	70.44%	13.63065	13.00854	13.63065	13.00854	13.8512	13.21611	14.59259	13.92449	14.06871	13.42605	14.06871	13.42605	18.452178	17.61308	18.45218	17.61308	18.65802	17.80801
383450	3737850	68.59%	12.049254	11.3435	12.04925	11.3435	12.22583	11.50672	12.88651	12.12897	12.43439	11.70379	12.43439	11.70379	16.327523	15.3779	16.32752	15.3779	16.49996	15.53833
383950	3737850	60.00%	10.998086	10.56661	10.99809	10.56661	11.14741	10.70729	11.75368	11.29062	11.34769	10.90237	11.34769	10.90237	14.914621	14.33154	14.91462	14.33154	15.06585	14.47547
384450	3737850	68.30%	9.846203	9.251244	9.846203	9.251244	9.965309	9.358843	10.51235	9.873878	10.15784	9.542941	10.15784	9.542941	13.36453	12.56201	13.36453	12.56201	13.49249	12.67989
384950	3737850	61.80%	9.227075	8.770195	9.227075	8.770195	9.329418	8.863828	9.844678	9.354705	9.517881	9.046517	9.517881	9.046517	12.532567	11.91452	12.53257	11.91452	12.64768	12.0221
385450	3737850	56.64%	8.51369	8.161172	8.51369	8.161172	8.594835	8.237135	9.074301	8.697332	8.781297	8.417678	8.781297	8.417678	11.573518	11.09547	11.57352	11.09547	11.67302	11.18995
385950	3737850	55.22%	7.836027	7.61399	7.836027	7.61399	7.897918	7.674296	8.343009	8.106983	8.08128	7.853159	8.08128	7.853159	10.662504	10.35844	10.6625	10.35844	10.74758	10.44136
386450	3737850	61.82%	7.525459	7.303547	7.525459	7.303547	7.577973	7.354854	8.007763	7.771973	7.761341	7.532819	7.761341	7.532819	10.243513	9.940469	10.24351	9.940469	10.32186	10.01677
386950	3737850	67.28%	7.308855	7.068177	7.308855	7.068177	7.354998	7.112037	7.774129	7.517523	7.5384	7.289926	7.5384	7.289926	9.950722	9.624075	9.950722	9.624075	10.02453	9.695008
387450	3737850	64.98%	6.996741	6.819579	6.996741	6.819579	7.035087	6.857669	7.438046	7.250108	7.216027	7.03302	7.216027	7.03302	9.53048	9.289314	9.53048	9.289314	9.598159	9.355576
387950	3737850	64.75%	6.947669	6.697304	6.947669	6.697304	6.981559	6.731127	7.394407	7.12762	7.166337	6.906833	7.166337	6.906833	9.464271	9.125209	9.464271	9.125209	9.529597	9.18849
388450	3737850	62.19%	6.646633	6.484177	6.646633	6.484177	6.675292	6.513419	7.060438	6.88875	6.854389	6.686938	6.854389	6.686938	9.059279	8.834937	9.059279	8.834937	9.119647	8.894429
388950	3737850	64.87%	6.722594	6.484462	6.722594	6.484462	6.747584	6.509769	7.138662	6.886146	6.933599	6.686465	6.933599	6.686465	9.163791	8.841688	9.163791	8.841688	9.223032	8.89912
389450	3737850	62.76%	6.595936	6.37204	6.595936	6.37204	6.617123	6.393494	7.001698	6.764365	6.802309	6.570293	6.802309	6.570293	8.994598	8.691047	8.994598	8.691047	9.050959	8.745763
380450	3738350	72.53%	14.901849	14.53796	14.90185	14.53796	15.1601	14.79176	15.96334	15.57519	15.37504	15.00082	15.37504	15.00082	20.174826	19.67818	20.17483	19.67818	20.40725	19.90605
380950	3738350	72.92%	15.317188	14.70074	15.31719	14.70074	15.58724	14.95908	16.41257	15.75143	15.80718	15.17094	15.80718	15.17094	20.726536	19.89306	20.72654	19.89306	20.96838	20.12473
381450	3738350	66.06%	15.7703	14.87569	15.7703	14.87569	16.04763	15.13522	16.89829	15.93828	16.2773	15.35354	16.2773	15.35354	21.334718	20.1265	21.33472	20.1265	21.58385	20.3604
381950	3738350	73.33%	14.961533	14.12486	14.96153	14.12486	15.22059	14.36521	16.0288	15.12954	15.44197	14.57819	15.44197	14.57819	20.244079	19.11528	20.24408	19.11528	20.47838	19.33441
382450	3738350	69.14%	14.077305	13.45764	14.07731	13.45764	14.31241	13.68026	15.0755	14.41043	14.52887	13.88917	14.52887	13.88917	19.054327	18.21718	19.05433	18.21718	19.27035	18.42266
382950	3738350	74.16%	12.907536	12.15674	12.90754	12.15674	13.11153	12.3447	13.81463	13.00781	13.32046	12.54423	13.32046	12.54423	17.480388	16.46933	17.48039	16.46933	17.6726	16.64797
383450	3738350	72.34%	11.398359	10.98835	11.39836	10.98835	11.56204	11.14565	12.18739	11.74832	11.76037	11.33616	11.76037	11.33616	15.452536	14.89955	15.45254	14.89955	15.6136	15.05435
383950	3738350	62.94%	10.571471	10.18684	10.57147	10.18684	10.71287	10.32094	11.29581	10.88327	10.90587	10.50879	10.90587	10.50879	14.340936	13.82103	14.34094	13.82103	14.4849	13.9587
384450	3738350	70.43%	9.913713	9.24545	9.913713	9.24545	10.03647	9.35446	10.58622	9.868343	10.22707	9.535792	10.22707	9.535792	13.455266	12.55574	13.45527	12.55574	13.58543	12.67405
384950	3738350	61.77%	9.000391	8.597075	9.000391	8.597075	9.099696	8.688423	9.601984	9.16922	9.282524	8.866196	9.282524	8.866196	12.228268	11.68332	12.22827	11.68332	12.33999	11.78823
385450	3738350	57.27%	8.772891	8.193713	8.772891	8.193713	8.86039	8.270857	9.353265	8.73215	9.048831	8.449783	9.048831	8.449783	11.922996	11.14226	11.923	11.14226	12.02751	11.23726
385950	3738350	58.46%	7.99302	7.68658	7.99302	7.68658	8.062431	7.751142	8.514381	8.186525	8.243045	7.927203	8.243045	7.927203	10.872478	10.45662	10.87248	10.45662	10.96233	10.54199
386450	3738350	56.89%	7.414475	7.191094	7.414475	7.191094	7.468421	7.2434	7.890821	7.653168	7.645731	7.415739	7.645731	7.415739	10.093505	9.788669	10.09351	9.788669	10.17157	9.864447
386950	3738350	58.28%	7.166563	6.87699	7.166563	6.87699	7.212736	6.920936	7.623084	7.314425	7.390608	7.090706	7.390608	7.090706	9.758638	9.36732	9.758638	9.36732	9.831257	9.436566

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	2026_ALT1_CAAQS	2026_ALT1_NAAQS	2026_NP_CAAQS	2026_NP_NAAQS	2026_ALT3_CAAQS	2026_ALT3_NAAQS	2026_ALT4_CAAQS	2026_ALT4_NAAQS	2026_ALT5_CAAQS	2026_ALT5_NAAQS	2026_PP_CAAQS	2026_PP_NAAQS	2033_ALT1_CAAQS	2033_ALT1_NAAQS	2033_NP_CAAQS	2033_NP_NAAQS	2033_ALT3_CAAQS	2033_ALT3_NAAQS
387450	3738350	65.43%	7.028095	6.748538	7.028095	6.748538	7.069109	6.786799	7.473032	7.17458	7.248275	6.958533	7.248275	6.958533	9.571803	9.194759	9.571803	9.194759	9.640996	9.260373
387950	3738350	65.54%	6.802468	6.527782	6.802468	6.527782	6.836897	6.560806	7.229415	6.936978	7.015106	6.730208	7.015106	6.730208	9.268814	8.897987	9.268814	8.897987	9.333105	8.959353
388450	3738350	62.09%	6.500013	6.337414	6.500013	6.337414	6.529134	6.366559	6.906477	6.743011	6.702414	6.535133	6.702414	6.535133	8.860739	8.637762	8.860739	8.637762	8.920147	8.696137
388950	3738350	62.20%	6.613464	6.465081	6.613464	6.465081	6.639357	6.4917	7.02326	6.866687	6.813651	6.662109	6.813651	6.662109	9.009038	8.806649	9.009038	8.806649	9.067593	8.86462
389450	3738350	63.93%	6.459357	6.272953	6.459357	6.272953	6.481477	6.295569	6.857296	6.660049	6.660297	6.467657	6.660297	6.467657	8.809969	8.555929	8.809969	8.555929	8.865614	8.610438
380450	3738850	76.08%	13.572949	13.19534	13.57295	13.19534	13.805	13.42047	14.53703	14.13233	13.98519	13.61168	13.98519	13.61168	18.360245	17.8692	18.36025	17.8692	18.56964	18.07292
380950	3738850	72.42%	14.17396	13.6626	14.17396	13.6626	14.41852	13.89746	15.18313	14.63471	14.62469	14.09679	14.62469	14.09679	19.188442	18.49729	19.18844	18.49729	19.40911	18.70948
381450	3738850	75.49%	14.0042	13.41042	14.0042	13.41042	14.24334	13.63701	14.99984	14.36229	14.45049	13.83782	14.45049	13.83782	18.958183	18.15595	18.95818	18.15595	19.1752	18.36256
381950	3738850	75.30%	13.681034	12.86287	13.68103	12.86287	13.90977	13.07496	14.6507	13.77201	14.11778	13.27194	14.11778	13.27194	18.522009	17.41949	18.52201	17.41949	18.73176	17.6149
382450	3738850	69.31%	13.13221	12.53941	13.13221	12.53941	13.34432	12.73998	14.05767	13.42175	13.55061	12.93889	13.55061	12.93889	17.785473	16.98393	17.78547	16.98393	17.98296	17.17147
382950	3738850	72.85%	12.206174	11.62677	12.20617	11.62677	12.3938	11.80273	13.05975	12.43766	12.59445	11.99578	12.59445	11.99578	16.538653	15.75702	16.53865	15.75702	16.71739	15.92574
383450	3738850	66.99%	11.144702	10.70549	11.1447	10.70549	11.30394	10.85704	11.91528	11.4444	11.49744	11.04322	11.49744	11.04322	15.111727	14.51935	15.11173	14.51935	15.26861	14.66923
383950	3738850	66.02%	10.244316	9.757198	10.24432	9.757198	10.37898	9.882347	10.94421	10.42142	10.56699	10.06365	10.56699	10.06365	13.901504	13.24433	13.9015	13.24433	14.03963	13.37418
384450	3738850	63.07%	9.642411	9.252283	9.642411	9.252283	9.760735	9.364102	10.29538	9.877314	9.945851	9.542324	9.945851	9.542324	13.090572	12.56437	13.09057	12.56437	13.21638	12.68402
384950	3738850	68.72%	8.97521	8.377384	8.97521	8.377384	9.07638	8.465475	9.576373	8.93387	9.255904	8.638242	9.255904	8.638242	12.194088	11.38827	12.19409	11.38827	12.30642	11.48977
385450	3738850	55.99%	8.321393	8.00832	8.321393	8.00832	8.403871	8.086825	8.871064	8.536532	8.58156	8.25806	8.58156	8.25806	11.313032	10.88933	11.31303	10.88933	11.41159	10.98362
385950	3738850	57.96%	8.009921	7.597601	8.009921	7.597601	8.082966	7.663104	8.534618	8.092687	8.260049	7.834709	8.260049	7.834709	10.894231	10.33612	10.89423	10.33612	10.98591	10.42118
386450	3738850	60.12%	7.640713	7.305038	7.640713	7.305038	7.701283	7.36157	8.135064	7.776718	7.879359	7.533115	7.879359	7.533115	10.397641	9.941918	10.39764	9.941918	10.48062	10.02055
386950	3738850	57.87%	7.101615	6.851463	7.101615	6.851463	7.149399	6.897964	7.555095	7.289177	7.322726	7.064574	7.322726	7.064574	9.670842	9.330411	9.670842	9.330411	9.743629	9.400789
387450	3738850	57.60%	6.825573	6.560409	6.825573	6.560409	6.865784	6.599135	7.257607	6.975325	7.038252	6.763582	7.038252	6.763582	9.298203	8.939537	9.298203	8.939537	9.365365	9.003885
387950	3738850	63.06%	6.626848	6.391377	6.626848	6.391377	6.662117	6.425378	7.043623	6.793003	6.832946	6.589096	6.832946	6.589096	9.03064	8.712004	9.03064	8.712004	9.093929	8.772824
388450	3738850	64.46%	6.408574	6.154059	6.408574	6.154059	6.439015	6.183367	6.809079	6.538426	6.607719	6.344339	6.607719	6.344339	8.73581	8.390887	8.73581	8.390887	8.795176	8.447743
388950	3738850	62.50%	6.315139	6.157381	6.315139	6.157381	6.341076	6.183942	6.706915	6.540199	6.510953	6.328917	6.510953	6.328917	8.611946	8.371313	8.611946	8.371313	8.668337	8.426514
389450	3738850	65.28%	6.373272	6.113007	6.373272	6.113007	6.396572	6.136281	6.766886	6.49078	6.560658	6.298396	6.560658	6.298396	8.677753	8.330644	8.677753	8.330644	8.73315	8.384062
380450	3739350	76.01%	12.859206	12.36614	12.85921	12.36614	13.07354	12.57079	13.76835	13.2393	13.18181	12.73954	13.18181	12.73954	17.316171	16.73675	17.31617	16.73675	17.51021	16.92382
380950	3739350	69.93%	13.206883	12.66864	13.20688	12.66864	13.42717	12.87903	14.14139	13.56422	13.6245	13.06855	13.6245	13.06855	17.889054	17.16185	17.88905	17.16185	18.09049	17.35445
381450	3739350	74.35%	12.889497	12.56154	12.8895	12.56154	13.10109	12.76816	13.7993	13.44858	13.29737	12.95948	13.29737	12.95948	17.460815	17.01509	17.46082	17.01509	17.65573	17.20538
381950	3739350	75.29%	12.67613	11.94845	12.67613	11.94845	12.88147	12.13912	13.56921	12.7879	13.07805	12.32602	13.07805	12.32602	17.171624	16.19034	17.17162	16.19034	17.36209	16.3683
382450	3739350	70.12%	12.156158	11.73328	12.15616	11.73328	12.34582	11.91623	13.00737	12.55491	12.54062	12.10463	12.54062	12.10463	16.473798	15.90028	16.4738	15.90028	16.65281	16.07299
382950	3739350	72.49%	11.501628	11.13604	11.50163	11.13604	11.67241	11.30112	12.30088	11.90997	11.86449	11.48823	11.86449	11.48823	15.58308	15.09644	15.58308	15.09644	15.7556	15.25647
383450	3739350	64.78%	10.757424	10.28176	10.75742	10.28176	10.90842	10.42421	11.49896	10.98895	11.09657	10.60493	11.09657	10.60493	14.591121	13.94916	14.59112	13.94916	14.74094	14.09135
383950	3739350	69.65%	9.863344	9.327389	9.863344	9.327389	9.990417	9.443869	10.53504	9.95977	10.17264	9.618874	10.17264	9.618874	13.389061	12.66597	13.38906	12.66597	13.52051	12.78825
384450	3739350	60.53%	9.325633	8.985638	9.325633	8.985638	9.437539	9.093008	9.95498	9.591504	9.617646	9.266259	9.617646	9.266259	12.665189	12.20531	12.66519	12.20531	12.78533	12.3207
384950	3739350	61.91%	8.782957	8.445319	8.782957	8.445319	8.880979	8.537317	9.37022	9.008437	9.056455	8.708187	9.056455	8.708187	11.936018	11.47886	11.93602	11.47886	12.04524	11.58274
385450	3739350	61.99%	8.329139	7.700457	8.329139	7.700457	8.41296	7.772113	8.880056	8.205217	8.589138	7.938845	8.589138	7.938845	11.323677	10.47682	11.32368	10.47682	11.42287	10.56526
385950	3739350	58.16%	7.785106	7.560326	7.785106	7.560326	7.855526	7.628096	8.294367	8.054592	8.027159	7.795793	8.027159	7.795793	10.591041	10.2848	10.59104	10.2848	10.67967	10.37062
386450	3739350	57.22%	7.555916	7.149612	7.555916	7.149612	7.619088	7.206216	8.046797	7.611789	7.791242	7.371784	7.791242	7.371784	10.281637	9.731793	10.28164	9.731793	10.36517	9.809186
386950	3739350	61.43%	7.121986	6.805088	7.121986	6.805088	7.174142	6.853488	7.579437	7.241229	7.343057	7.016346	7.343057	7.016346	9.69735	9.266719	9.69735	9.266719	9.772296	9.337635
387450	3739350	58.71%	6.783035	6.535133	6.783035	6.535133	6.82557	6.576215	7.213857	6.950068	6.993529	6.737277	6.993529	6.737277	9.240444	8.904074	9.240444	8.904074	9.308307	8.969362
387950	3739350	57.64%	6.482818	6.313403	6.482818	6.313403	6.517846	6.348063	6.890635	6.710759	6.683605	6.508372	6.683605	6.508372	8.835827	8.605782	8.835827	8.605782	8.897827	8.666327
388450	3739350	60.01%	6.30017	6.039625	6.30017	6.039625	6.331783	6.06966	6.694819	6.417425	6.495203	6.225498	6.495203	6.225498	8.58858	8.235927	8.58858	8.235927	8.647606	8.292169
388950	3739350	63.92%	6.21107	5.997782	6.21107	5.997782	6.238648	6.024386	6.597592	6.370871	6.402957	6.18265	6.402957	6.18265	8.47018	8.180273	8.47018	8.180273	8.52655	8.234597
389450	3739350	62.66%	6.057152	5.866079	6.057152	5.866079	6.080943	5.889546	6.431853	6.229145	6.243867	6.046543	6.243867	6.046543	8.263127	8.002963	8.263127	8.002963	8.316462	8.054756
380450	3739850	74.79%	12.142472	11.62853	12.14247	11.62853	12.33987	11.81555	12.99683	12.44516	12.52219	11.88256	12.52219	11.88256	16.459365	15.62365	16.45937	15.62365	16.64117	15.79448
380950	3739850	73.94%	11.973879	11.59357	11.97388	11.59357	12.16677	11.78015	12.81558	12.40837	12.34945	11.95725	12.34945	11.95725	16.229648	15.71421	16.22965	15.71421	16.40827	15.88708
381450	3739850	74.33%	11.975198	11.58824	11.9752	11.58824	12.16641	11.77279	12.81595	12.40165	12.35146	11.95272	12.35146	11.95272	16.231112	15.70612	16.23111	15.70612	16.4091	15.87819
381950	3739850	74.59%	11.860356	11.27831	11.86036	11.27831	12.0471	11.45317	12.69142	12.06675	12.23356	11.6331	12.23356	11.6331	16.075971	15.28896	16.07597	15.28896	16.25099	15.45405
382450	3739850	69.77%	11.351073	10.90366	11.35107	10.90366	11.52319	11.06784	12.14189	11.66261	11.70789	11.24668	11.70789	11.24668	15.390559	14.78408	15.39056	14.78408	15.55474	14.94127
382950	3739850	73.32%	10.835575	10.5166	10.83558	10.5166	10.99207	10.66974	11.58507	11.24492	11.17582	10.84692	11.17582	10.84692	14.697256	14.26363	14.69726	14.26363	14.85005	14.41261
383450	3739850	67.23%	10.357134	9.788136	10.35713	9.788136	10.50058	9.920533	11.06937	10.45874	10.68234	10.09432	10.68234	10.09432	14.05213	13.2846	14.05213	13.2846	14.19521	13.41801
383950	3739850	68.85%	9.494036	9.105075	9.494036	9.105075	9.614799	9.218944	10.13917	9.722198	9.790605	9.38864	9.790605	9.38864	12.891127	12.36604	12.89113	12.36604	13.01666	12.4853
384450	3739850	65.18%	9.104047	8.602677	9.104047	8.602677	9.212135	8.701872	9.717333	9.179719	9.388057	8.869518	9.388057	8.869518	12.367206	11.69125	12.36721	11.69125	12.48372	11.79959
384950	3739850	65.61%	8.644937	8.333113	8.644937	8.333113	8.741947	8.4246	9.223088	8.888979	8.91334	8.591657	8.91334	8.591657	11.749818	11.32765	11.74982	11.32765	11.85742	11.43034
385450	3739850	64.49%	8.32959	7.759792	8.32959	7.759792	8.415407	7.834422	8.88178	8.270031	8.589246	7.999801	8.589246	7.999801	11.323782	10.55654	11.32378	10.55654	11.42389	10.6468
385950	3739850	54.54%	7.703325	7.30381	7.703325	7.30381	7.773839	7.366561	8.207614	7.778972	7.942233	7.529712	7.942233	7.529712	10.480549	9.940876	10.48055	9.940876	10.56853	10.02214
386450	3739850	60.22%	7.381223	7.1465	7.381223	7.1465	7.443394	7.20581	7.860729	7.610135	7.610023	7.367912	7.610023	7.367912	10.045947	9.727291	10.04595	9.727291	10.12755	9.805859
386950	3739850	57.94%	7.111959	6.749957	7.111959	6.749957	7.167241	6.799573	7.570809	7.183379	7.332282	6.958642	7.332282	6.958642	9.682626	9.192487	9.682626	9.192487	9.758972	9.263452
387450	3739850	61.75%	6.784975	6.483206	6.784975	6.483206	6.831037	6.525397	7.218093	6.895682	6.994864	6.683269	6.994864	6.683269	9.242282	8.833426	9.242282	8.833426	9.311757	8.898819
387950	3739850	59.57%	6.451445	6.203909	6.451445	6.203909	6.489425	6.239988	6.859199	6.595232	6.650579	6.393847	6.650579	6.393847	8.792564	8.458752	8.792564	8.458752	8.855663	8.51892
388450	3739850	56.43%	6.178876	5.958285	6.178876	5.958285	6.21049	5.989372	6.566086	6.331552	6.369331	6.140202	6.369331	6.140202	8.424587	8.127156	8.424587	8.127156	8.482639	8.18308
388950	3739850	57.22%	6.108693	5.892495	6.108693	5.892495	6.137003	5.91892	6.489555	6.258986	6.297122	6.073339	6.297122	6.073339	8.330447	8.038137	8.330447	8.038137	8.38641	8.091501
389450	3739850	61.70%	5.934841	5.786796	5.934841	5.786796	5.959264	5.810461	6.302469	6.145161	6.116925	5.964376	6.116925	5.964376	8.09741	7.895434	8.09741	7.895434	8.150067	7.946703
380450	3740350	71.54%	11.59055	11.2029	11.59055	11.2029	11.77374	11.37921	12.40196	11.98668	11.95115	11.55152	11.95115	11.55152	15.718522	15.19313	15.71852	15.19313	15.88912	15.3577
380950	3740350	70.98%	11.619715	11.0337	11.61972	11.0337	11.80363	11.20512	12.43381	11.80442	11.98276	11.378	11.98276	11.378	15.754616	14.96302	15.75462	14.96302	15.92609	15.12416
381450	3740350	77.02%	11.196895	10.71016	11.1969	10.71016	11.37094	10.8757	11.97926	11.45767	11.54688	11.04424	11.54688	11.04424	15.183013	14.52504	15.18301	14.52504	15.34674	14.68102
381950	3740350	74.21%	11.171201	10.65922	11.1712	10.65922	11.34157	10.81984	11.94969	11.40061	11.52085	10.99249	11.52085	10.99249	15.149219	14.4569	15.14922	14.4569	15.3111	14.61021
382450	3740350	69.94%	10.770681	10.27447	10.77068	10.27447	10.92975	10.42437	11.51764	10.98571	11.10746	10.59555	11.10746	10.59555	14.610077	13.93853	14.61008	13.93853	14.76343	14.08389
382950	3740350	73.39%	10.30936	9.885632	10.30936	9.885632	10.4549	10.02516	11.01975	10.56654	10.63164	10.19379	10.63164	10.19379	13.988669	13.41558	13.98867	13.41558	14.13213	13.55296
383450	3740350	70.75%	9.852383	9.277225	9.852383	9.277225	9.988829	9.399459	10.53523	9.9101	10.1601	9.564817	10.1601	9.564817	13.372366	12.59538	13.37237	12.59538	13.50691	12.71992
383950	3740350	65.95%	9.176993	8.973048	9.176993	8.973048	9.291578	9.085904	9.79875	9.581432	9.462454	9.251793	9.462454	9.251793	12.464556	12.18784	12.46456	12.18784	12.58462	12.30555
384450	3740350	64.82%	8.58658	8.124483	8.58658	8.124483	8.686493	8.215152	9.163122	8.666945	8.852788	8.374949	8.852788	8.374949	11.669082	11.0465	11.66908	11.0465	11.77764	11.14703
384950	3740350	61.23%	8.235115	8.030881	8.235115	8.030881	8.326191	8.118819	8.784598	8.566107	8.48964	8.278986	8.48964	8.278986	11.19608	10.91917	11.19608	10.91917	11.29771	11.01782
385450	3740350	61.12%	7.998886	7.671658	7.998886	7.671658	8.079965	7.747531	8.527842	8.177325	8.246913	7.908353	8.246913	7.908353	10.877827	10.43651	10.87783	10.43651	10.97304	10.52669
385950	3740350	61.71%	7.658479	7.160401	7.658479	7.160401	7.73109	7.221967	8.161386	7.625986	7.895514	7.38095	7.895514	7.38095	10.419019	9.747613	10.41902	9.747613	10.50762	9.827127
386450	3740350	53.96%	7.270977	6.896658	7.270977	6.896658	7.332452	6.950981	7.74318	7.34164	7.495367	7.108815	7.495367	7.108815	9.89789	9.392253	9.89789	9.392253	9.978201	9.466341
386950	3740350	62.38%	6.996815	6.693258	6.996815	6.693258	7.051797	6.74375	7.448474	7.123629	7.213055	6.899248	7.213055	6.899248	9.52659	9.116482	9.52659	9.116482	9.601886	9.187294
387450	3740350	58.55%	6.784613	6.391928	6.784613	6.391928	6.83346	6.435376	7.219598	6.799499	6.994472	6.588049	6.994472	6.588049	9.240104	8.710289	9.240104	8.710289	9.31095	8.775439
387950	3740350	62.11%	6.476247	6.178809	6.476247	6.178809	6.517114	6.215891	6.88745	6.569419	6.676233	6.368244	6.676233	6.368244	8.824463	8.423275	8.824463	8.423275	8.889179	8.483808
388450	3740350	60.44%	6.104026	5.930617	6.104026	5.930617	6.137368	5.962989	6.487813	6.303094	6.291626	6.111614	6.291626	6.111614	8.322384	8.08868	8.322384	8.08868	8.380666	8.145023
388950	3740350	57.45%	6.013816	5.792999	6.013816	5.792999	6.042382	5.820273	6.389197	6.153784	6.199196	5.969475	6.199196	5.969475	8.200892	7.904402	8.200892	7.904402	8.256298	7.95724
389450	3740350	59.61%	5.848532	5.658517	5.848532	5.658517	5.873584	5.682006	6.211438	6.008831	6.027827	5.831029	6.027827	5.831029	7.979326	7.722568	7.979326	7.722568	8.031669	7.772652
380450	3740850	71.16%	10.907782	10.56644	10.90778	10.56644	11.07523	10.72889	11.66758	11.3025	11.24567	10.89331	11.24567	10.89331	14.798815	14.33647	14.79882	14.33647	14.95664	14.48936
380950	3740850	77.11%	10.716281	10.22547	10.71628	10.22547	10.88083	10.3801	11.46295	10.93608	11.0488	10.54196	11.0488	10.54196	14.537749	13.87515	14.53775	13.87515	14.69288	14.02188
381450	3740850	74.20%	10.744789	10.32636	10.74479	10.32636	10.90705	10.48172	11.4919	11.04378	11.07924	10.64705	11.07924	10.64705	14.575964	14.01026	14.57596	14.01026	14.73039	14.1583
381950	3740850	75.09%	10.421065	9.918948	10.42107	9.918948	10.57518	10.06357	11.14332	10.6048	10.74492	10.22657	10.74492	10.22657	14.139932	13.46128	14.13993	13.46128	14.28805	13.60109
382450	3740850	69.68%	10.18004	9.706925	10.18004	9.706925	10.3263	9.844755	10.88277	10.3757	10.49673	10.00827	10.49673	10.00827	13.814943	13.1752	13.81494	13.1752	13.95756	13.31026
382950	3740850	73.03%	9.827462	9.364347	9.827462	9.364347	9.962691	9.492808	10.50178	10.00626	10.13311	9.654411	10.13311	9.654411	13.3403	12.71439	13.3403	12.71439	13.47503	12.84236

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	*2026_ALT1_CAAQS*	*2026_ALT1_NAAQS*	*2026_NP_CAAQS*	*2026_NP_NAAQS*	*2026_ALT3_CAAQS*	*2026_ALT3_NAAQS*	*2026_ALT4_CAAQS*	*2026_ALT4_NAAQS*	*2026_ALT5_CAAQS*	*2026_ALT5_NAAQS*	*2026_PP_CAAQS*	*2026_PP_NAAQS*	*2033_ALT1_CAAQS*	*2033_ALT1_NAAQS*	*2033_NP_CAAQS*	*2033_NP_NAAQS*	*2033_ALT3_CAAQS*	*2033_ALT3_NAAQS*
383450	3740850	72.76%	9.373618	8.962412	9.373618	8.962412	9.496829	9.078876	10.01258	9.572349	9.664164	9.239968	9.664164	9.239968	12.718683	12.17287	12.71868	12.17287	12.85541	12.29213
383950	3740850	63.71%	8.887579	8.558574	8.887579	8.558574	8.997718	8.66374	9.488871	9.136675	9.163045	8.822807	9.163045	8.822807	12.074078	11.62987	12.07408	11.62987	12.18974	11.74061
384450	3740850	68.09%	8.323929	7.963913	8.323929	7.963913	8.418592	8.052113	8.881002	8.494947	8.580867	8.208611	8.580867	8.208611	11.315909	10.83038	11.31591	10.83038	11.41985	10.92844
384950	3740850	61.63%	8.050393	7.701234	8.050393	7.701234	8.138739	7.78253	8.58681	8.21196	8.298326	7.937579	8.298326	7.937579	10.947215	10.47623	10.94722	10.47623	11.04607	10.56902
385450	3740850	67.49%	7.836718	7.567483	7.836718	7.567483	7.916711	7.643291	8.355096	8.066774	8.078965	7.800412	8.078965	7.800412	10.658531	10.29538	10.65853	10.29538	10.75196	10.38469
385950	3740850	62.24%	7.436132	7.179232	7.436132	7.179232	7.50658	7.244709	7.92411	7.648447	7.665312	7.399944	7.665312	7.399944	10.118569	9.771784	10.11857	9.771784	10.2044	9.85328
386450	3740850	57.86%	7.046537	6.666365	7.046537	6.666365	7.107502	6.719611	7.504934	7.096711	7.263464	6.870531	7.263464	6.870531	9.592589	9.080118	9.592589	9.080118	9.671014	9.151914
386950	3740850	56.87%	6.794865	6.515817	6.794865	6.515817	6.848004	6.564283	7.233004	6.934043	7.003883	6.715458	7.003883	6.715458	9.25385	8.877088	9.25385	8.877088	9.326644	8.945513
387450	3740850	61.88%	6.675503	6.338401	6.675503	6.338401	6.724362	6.382982	7.103822	6.743407	6.881294	6.532287	6.881294	6.532287	9.092478	8.637668	9.092478	8.637668	9.162431	8.702923
387950	3740850	60.45%	6.473584	6.099265	6.473584	6.099265	6.51699	6.137537	6.886238	6.485726	6.673101	6.285484	6.673101	6.285484	8.820041	8.315413	8.820041	8.315413	8.88592	8.37585
388450	3740850	62.32%	6.095074	5.800846	6.095074	5.800846	6.131596	5.832709	6.480412	6.165056	6.282173	5.977059	6.282173	5.977059	8.308671	7.913325	8.308671	7.913325	8.368396	7.96838
388950	3740850	59.77%	5.957719	5.751961	5.957719	5.751961	5.98809	5.780695	6.330857	6.111204	6.140853	5.926811	6.140853	5.926811	8.124204	7.848166	8.124204	7.848166	8.180005	7.901381
389450	3740850	59.15%	5.768772	5.609145	5.768772	5.609145	5.794598	5.633394	6.1274	5.956953	5.945359	5.779844	5.945359	5.779844	7.870396	7.655228	7.870396	7.655228	7.922524	7.705299
380450	3741350	70.48%	10.322875	10.00728	10.32288	10.00728	10.47688	10.15607	11.03835	10.7005	10.64085	10.31542	10.64085	10.31542	14.011834	13.58401	14.01183	13.58401	14.15863	13.72608
380950	3741350	79.70%	9.806268	9.57906	9.806268	9.57906	9.951613	9.720743	10.48517	10.242	10.10793	9.873628	10.10793	9.873628	13.31208	13.00405	13.31208	13.00405	13.45107	13.13955
381450	3741350	74.51%	10.137185	9.811635	10.13719	9.811635	10.28639	9.955513	10.83878	10.49028	10.45065	10.1148	10.45065	10.1148	13.758493	13.31747	13.75849	13.31747	13.90189	13.45604
381950	3741350	74.45%	9.859157	9.379893	9.859157	9.379893	10.00073	9.512077	10.53904	10.02479	10.16376	9.668966	10.16376	9.668966	13.383922	12.73645	13.38392	12.73645	13.52162	12.86608
382450	3741350	69.62%	9.644493	9.227181	9.644493	9.227181	9.779402	9.354655	10.30725	9.859961	9.942826	9.511922	9.942826	9.511922	13.093982	12.5299	13.09398	12.5299	13.22698	12.65621
382950	3741350	72.67%	9.355616	8.874804	9.355616	8.874804	9.482135	8.993569	9.99559	9.480534	9.645096	9.147757	9.645096	9.147757	12.70434	12.05568	12.70434	12.05568	12.83123	12.17511
383450	3741350	74.01%	8.947965	8.663602	8.947965	8.663602	9.063219	8.775034	9.555874	9.252047	9.223909	8.930645	9.223909	8.930645	12.156316	11.77043	12.15632	11.77043	12.27466	11.8849
383950	3741350	63.07%	8.542135	8.256946	8.542135	8.256946	8.646671	8.3573	9.123321	8.815375	8.805794	8.510792	8.805794	8.510792	11.607935	11.22299	11.60794	11.22299	11.71824	11.32907
384450	3741350	67.94%	8.153528	7.823087	8.153528	7.823087	8.247284	7.910406	8.699746	8.345025	8.404714	8.062931	8.404714	8.062931	11.084653	10.63956	11.08465	10.63956	11.18688	10.73611
384950	3741350	64.17%	7.766418	7.35748	7.766418	7.35748	7.850062	7.432137	8.282528	7.8429	8.004579	7.58178	8.004579	7.58178	10.564266	10.01367	10.56427	10.01367	10.65863	10.10055
385450	3741350	62.19%	7.530704	7.308488	7.530704	7.308488	7.60688	7.381127	8.028036	7.790023	7.762412	7.532537	7.762412	7.532537	10.245071	9.945304	10.24507	9.945304	10.33428	10.0311
385950	3741350	64.98%	7.099326	6.904828	7.099326	6.904828	7.166488	6.968557	7.564815	7.356342	7.317086	7.116185	7.317086	7.116185	9.662547	9.39975	9.662547	9.39975	9.744239	9.47833
386450	3741350	64.76%	6.943753	6.617207	6.943753	6.617207	7.005118	6.672143	7.396202	7.045653	7.157045	6.819435	7.157045	6.819435	9.452877	9.012761	9.452877	9.012761	9.5307	9.084971
386950	3741350	55.46%	6.623584	6.362058	6.623584	6.362058	6.675473	6.409565	7.050549	6.770324	6.826676	6.556321	6.826676	6.556321	9.021956	8.668902	9.021956	8.668902	9.092834	8.735676
387450	3741350	58.61%	6.501946	6.202653	6.501946	6.202653	6.549562	6.246092	6.918822	6.598581	6.701324	6.391485	6.701324	6.391485	8.858309	8.454702	8.858309	8.454702	8.926268	8.518274
387950	3741350	61.06%	6.364996	6.055911	6.364996	6.055911	6.408629	6.095499	6.771089	6.440628	6.560215	6.240538	6.560215	6.240538	8.673525	8.255881	8.673525	8.255881	8.738591	8.316617
388950	3741350	64.00%	5.926962	5.611111	5.926962	5.611111	5.959632	5.639931	6.299664	5.961721	6.108619	5.780457	6.108619	5.780457	8.081882	7.658089	8.081882	7.658089	8.138509	7.710139
389450	3741350	58.75%	5.716492	5.539508	5.716492	5.539508	5.743628	5.56551	6.072841	5.88419	5.891205	5.707397	5.891205	5.707397	7.798659	7.560398	7.798659	7.560398	7.851016	7.610726
380450	3741850	72.76%	9.609347	9.275792	9.609347	9.275792	9.749252	9.409268	10.27238	9.9146	9.903198	9.559022	9.903198	9.559022	13.050044	12.59895	13.05004	12.59895	13.18457	12.72798
380950	3741850	75.36%	9.671415	9.247892	9.671415	9.247892	9.812032	9.380239	10.33896	9.884429	9.968347	9.530704	9.968347	9.530704	13.131975	12.5606	13.13198	12.5606	13.26757	12.68897
381450	3741850	76.90%	9.410638	9.072823	9.410638	9.072823	9.545557	9.201085	10.05886	9.696433	9.699485	9.350899	9.699485	9.350899	12.779235	12.32248	12.77924	12.32248	12.91018	12.44775
381950	3741850	74.02%	9.348099	8.944029	9.348099	8.944029	9.479054	9.067088	9.990041	9.55651	9.635366	9.218256	9.635366	9.218256	12.695484	12.14943	12.69548	12.14943	12.82412	12.27129
382450	3741850	69.32%	9.117173	8.736581	9.117173	8.736581	9.241477	8.853627	9.740959	9.332769	9.39742	9.004584	9.39742	9.004584	12.383844	11.86936	12.38384	11.86936	12.50763	11.98685
382950	3741850	71.80%	8.925074	8.529805	8.925074	8.529805	9.043741	8.641591	9.533756	9.110126	9.199688	8.791286	9.199688	8.791286	12.124247	11.59038	12.12425	11.59038	12.244	11.70383
383450	3741850	74.73%	8.521082	8.311474	8.521082	8.311474	8.628643	8.416349	9.098127	8.874339	8.782606	8.5667	8.782606	8.5667	11.58044	11.29528	11.58044	11.29528	11.6918	11.40391
383950	3741850	66.27%	8.194187	7.865663	8.194187	7.865663	8.292767	7.958746	8.745783	8.393831	8.445644	8.106159	8.445644	8.106159	11.130645	10.69226	11.13065	10.69226	11.23552	10.79189
384450	3741850	65.57%	7.848565	7.615623	7.848565	7.615623	7.937652	7.700751	8.373223	8.123618	8.089229	7.848497	8.089229	7.848497	10.673198	10.35859	10.6732	10.35859	10.77081	10.45253
384950	3741850	63.36%	7.351638	7.154863	7.351638	7.154863	7.428756	7.22885	7.838395	7.627709	7.57582	7.372505	7.57582	7.372505	10.003999	9.738045	10.004	9.738045	10.09207	9.823128
385450	3741850	57.60%	7.290013	7.022102	7.290013	7.022102	7.363279	7.090573	7.770838	7.483582	7.513356	7.236425	7.513356	7.236425	9.919964	9.558418	9.919964	9.558418	10.00592	9.640008
385950	3741850	64.72%	7.01151	6.804651	7.01151	6.804651	7.078371	6.867937	7.471428	7.249777	7.226029	7.012382	7.226029	7.012382	9.543878	9.264271	9.543878	9.264271	9.624707	9.341839
386450	3741850	62.53%	6.799094	6.605057	6.799094	6.605057	6.858909	6.661795	7.241695	7.03401	7.007186	6.806904	7.007186	6.806904	9.257723	8.994991	9.257723	8.994991	9.333631	9.068007
386950	3741850	59.89%	6.609207	6.195063	6.609207	6.195063	6.663114	6.240998	7.036667	6.592149	6.811772	6.383396	6.811772	6.383396	9.001207	8.443339	9.001207	8.443339	9.07298	8.508047
387450	3741850	55.73%	6.280058	6.085102	6.280058	6.085102	6.325059	6.128067	6.681652	6.473627	6.47142	6.269932	6.47142	6.269932	8.559205	8.29514	8.559205	8.29514	8.624109	8.357604
387950	3741850	62.11%	6.212718	5.934822	6.212718	5.934822	6.255359	5.974004	6.608868	6.311964	6.402449	6.115265	6.402449	6.115265	8.467683	8.091632	8.467683	8.091632	8.53106	8.151238
388950	3741850	60.84%	5.904567	5.558069	5.904567	5.558069	5.939632	5.58781	6.277398	5.906183	6.084986	5.725868	6.084986	5.725868	8.050917	7.584824	8.050917	7.584824	8.108469	7.636994
389450	3741850	63.79%	5.708955	5.39883	5.708955	5.39883	5.738463	5.424473	6.066499	5.734614	5.883549	5.561343	5.883549	5.561343	7.786615	7.370571	7.786615	7.370571	7.840138	7.419553
380450	3742350	70.49%	9.220759	8.927601	9.220759	8.927601	9.351056	9.052782	9.853874	9.539796	9.501393	9.198856	9.501393	9.198856	12.527678	12.1309	12.52768	12.1309	12.65457	12.25322
380950	3742350	75.32%	9.163152	8.687832	9.163152	8.687832	9.29334	8.808453	9.793153	9.282747	9.443174	8.951753	9.443174	8.951753	12.446513	11.80597	12.44651	11.80597	12.57318	11.9244
381450	3742350	75.29%	9.068634	8.735412	9.068634	8.735412	9.195417	8.856126	9.690755	9.33354	9.345851	9.001849	9.345851	9.001849	12.319255	11.86869	12.31926	11.86869	12.44364	11.98769
381950	3742350	73.61%	8.889807	8.545379	8.889807	8.545379	9.01117	8.660302	9.497711	9.128453	9.161638	8.806361	9.161638	8.806361	12.077975	11.61177	12.07798	11.61177	12.19847	11.72668
382450	3742350	68.91%	8.653685	8.310244	8.653685	8.310244	8.768261	8.41924	9.243015	8.875288	8.918279	8.563688	8.918279	8.563688	11.759437	11.29475	11.75944	11.29475	11.87497	11.40508
382950	3742350	70.82%	8.517493	8.1182	8.517493	8.1182	8.628031	8.221587	9.096113	8.668123	8.778182	8.3659	8.778182	8.3659	11.575221	11.03544	11.57522	11.03544	11.68788	11.14169
383450	3742350	74.55%	8.18256	7.9456	8.18256	7.9456	8.284113	8.043924	8.73514	8.482012	8.432523	8.188449	8.432523	8.188449	11.123973	10.8017	11.12397	10.8017	11.22982	10.90438
383950	3742350	68.04%	7.950896	7.580874	7.950896	7.580874	8.045279	7.668643	8.484958	8.088345	8.193886	7.811839	8.193886	7.811839	10.8115	10.31119	10.8115	10.31119	10.91226	10.40605
384450	3742350	63.98%	7.627332	7.352857	7.627332	7.352857	7.71356	7.434013	8.136702	7.842392	7.860342	7.576959	7.860342	7.576959	10.374408	10.00339	10.37441	10.00339	10.46891	10.09343
384950	3742350	65.06%	7.221947	6.896145	7.221947	6.896145	7.298058	6.965635	7.700216	7.350334	7.441684	7.104848	7.441684	7.104848	9.828393	9.389345	9.828393	9.389345	9.914985	9.470248
385450	3742350	58.75%	7.042213	6.721984	7.042213	6.721984	7.112553	6.786023	7.50616	7.162398	7.257161	6.926097	7.257161	6.926097	9.584761	9.153108	9.584761	9.153108	9.667421	9.230266
385950	3742350	63.27%	6.779532	6.618152	6.779532	6.618152	6.843323	6.679694	7.223359	7.050808	6.986002	6.819342	6.986002	6.819342	9.230689	9.012176	9.230689	9.012176	9.308227	9.087441
386450	3742350	62.73%	6.640678	6.468142	6.640678	6.468142	6.698703	6.52343	7.072447	6.887815	6.843109	6.665156	6.843109	6.665156	9.043991	8.810075	9.043991	8.810075	9.117791	8.881327
386950	3742350	62.08%	6.461248	6.218401	6.461248	6.218401	6.514211	6.26756	6.879059	6.61904	6.658448	6.407423	6.658448	6.407423	8.801306	8.473236	8.801306	8.473236	8.871436	8.539698
387450	3742350	56.12%	6.235787	5.913822	6.235787	5.913822	6.282326	5.95461	6.635778	6.290521	6.425634	6.092687	6.425634	6.092687	8.498035	8.063869	8.498035	8.063869	8.563377	8.12396
387950	3742350	56.28%	6.036333	5.822223	6.036333	5.822223	6.076549	5.860808	6.420199	6.191978	6.219961	5.998194	6.219961	5.998194	8.229595	7.940199	8.229595	7.940199	8.29042	7.998552
388950	3742350	57.58%	5.829381	5.564498	5.829381	5.564498	5.864599	5.596595	6.197681	5.914637	6.006854	5.732633	6.006854	5.732633	7.949406	7.591836	7.949406	7.591836	8.006387	7.645226
389450	3742350	61.39%	5.678204	5.35547	5.678204	5.35547	5.709795	5.382167	6.035168	5.689353	5.851301	5.516465	5.851301	5.516465	7.744487	7.311055	7.744487	7.311055	7.798702	7.36021
380200	3731100	66.34%	11.885572	11.58289	11.88557	11.58289	12.02419	11.72089	12.67401	12.35392	12.22195	11.913	12.22195	11.913	16.22029	15.80054	16.22029	15.80054	16.36453	15.94297
380700	3731100	59.77%	14.652875	14.39624	14.65288	14.39624	14.85782	14.60123	15.65511	15.38433	15.09079	14.82942	15.09079	14.82942	19.92635	19.56876	19.92635	19.56876	20.12544	19.76674
380200	3731600	63.17%	13.861069	13.40414	13.86107	13.40414	14.04981	13.58774	14.80373	14.31703	14.26923	13.80045	14.26923	13.80045	18.86561	18.23966	18.86561	18.23966	19.05016	18.41906
380700	3731600	62.25%	16.492363	15.86985	16.49236	15.86985	16.74623	16.11397	17.63976	16.9743	16.99729	16.357	16.99729	16.357	22.38761	21.53991	22.38761	21.53991	22.62541	21.76897
381200	3731600	59.79%	18.413027	17.78344	18.41303	17.78344	18.72392	18.08371	19.71803	19.04414	18.99402	18.34559	18.99402	18.34559	24.94083	24.08634	24.94083	24.08634	25.22337	24.35924
381700	3731600	66.28%	21.189418	20.71738	21.18942	20.71738	21.57088	21.0927	22.71195	22.2077	21.87338	21.38657	21.87338	21.38657	28.65448	28.01388	28.65448	28.01388	28.99414	28.34715
383700	3731600	68.68%	17.966964	17.74146	17.96696	17.74146	18.18311	17.95857	19.19793	18.95971	18.58862	18.3561	18.58862	18.3561	24.27538	23.96654	24.27538	23.96654	24.51858	24.20867
384200	3731600	62.24%	16.808767	16.20075	16.80877	16.20075	16.9771	16.36377	17.94056	17.292	17.40058	16.77073	17.40058	16.77073	22.71006	21.88892	22.71006	21.88892	22.92276	22.09436
380200	3732100	69.12%	14.646467	14.31229	14.64647	14.31229	14.85786	14.52147	15.65291	15.29828	15.08506	14.74304	15.08506	14.74304	19.91179	19.45104	19.91179	19.45104	20.11415	19.65056
380700	3732100	61.26%	17.379145	16.74207	17.37915	16.74207	17.65893	17.01	18.59892	17.91612	17.91861	17.26215	17.91861	17.26215	23.56797	22.70441	23.56797	22.70441	23.82611	22.95231
381200	3732100	60.23%	19.590528	18.98992	19.59053	18.98992	19.93251	19.32119	20.9888	20.34505	20.21573	19.59575	20.21573	19.59575	26.51412	25.70184	26.51412	25.70184	26.82153	25.99957
381700	3732100	67.13%	22.004249	21.5746	22.00425	21.5746	22.40747	21.97167	23.59182	23.13264	22.71999	22.27721	22.71999	22.27721	29.74023	29.15665	29.74023	29.15665	30.09751	29.50795
382700	3732100	67.02%	21.636228	21.2932	21.63623	21.2932	21.99939	21.65378	23.17956	22.81439	22.35608	22.00198	22.35608	22.00198	29.2294	28.7619	29.2294	28.7619	29.56743	29.09768
383700	3732100	64.80%	15.926318	15.57741	15.92632	15.57741	16.10425	15.75509	17.00638	16.63627	16.47137	16.11059	16.47137	16.11059	21.53961	21.06519	21.53961	21.06519	21.74726	21.27016
380200	3732600	60.83%	15.896674	15.38579	15.89667	15.38579	16.14049	15.62119	17.00197	16.4551	16.38319	15.85624	16.38319	15.85624	21.57999	20.88763	21.57999	20.88763	21.80873	21.10869
380700	3732600	67.11%	17.929276	17.4346	17.92928	17.4346	18.22547	17.7218	19.19468	18.66431	18.49204	17.98124	18.49204	17.98124	24.29631	23.62781	24.29631	23.62781	24.5676	23.891
381200	3732600	58.57%	20.442168	19.75854	20.44217	19.75854	20.80685	20.10922	21.9081	21.17417	21.0998	20.39405	21.0998	20.39405	27.65069	26.72747	27.65069	26.72747	27.97632	27.04122
381700	3732600	63.37%	23.689955	22.25496	23.68996	22.25496	24.13685	22.63891	25.40942	23.68556	24.46582	22.80948	24.46582	22.80948	31.99945	29.8422	31.99945	29.8422	32.39067	30.20396
383700	3732600	65.41%	14.210062	13.89161	14.21006	13.89161	14.35748	14.04033	15.16405	14.82777	14.68986	14.36204	14.68986	14.36204	19.23926	18.79359	19.23926	18.79359	19.41769	18.97045
384200	3732600	63.13%	13.323185	12.80898	13.32319	12.80898	13.44292	12.92656	14.2059	13.65938	13.77567	13.24426	13.77567	13.24426	18.04447	17.33236	18.04447	17.33236	18.20324	17.48599

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	2026_ALT1_CAAQS	2026_ALT1_NAAQS	2026_NP_CAAQS	2026_NP_NAAQS	2026_ALT3_CAAQS	2026_ALT3_NAAQS	2026_ALT4_CAAQS	2026_ALT4_NAAQS	2026_ALT5_CAAQS	2026_ALT5_NAAQS	2026_PP_CAAQS	2026_PP_NAAQS	2033_ALT1_CAAQS	2033_ALT1_NAAQS	2033_NP_CAAQS	2033_NP_NAAQS	2033_ALT3_CAAQS	2033_ALT3_NAAQS
384700	3732600	60.22%	12.694038	12.0376	12.69404	12.0376	12.80102	12.13862	13.52965	12.82994	13.12319	12.44529	13.12319	12.44529	17.20105	16.31023	17.20105	16.31023	17.34836	16.44987
385200	3732600	54.77%	12.060291	11.55853	12.06029	11.55853	12.15548	11.65037	12.84909	12.31547	12.46565	11.94881	12.46565	11.94881	16.35135	15.66688	16.35135	15.66688	16.48768	15.79818
380200	3733100	63.39%	16.309312	15.82721	16.30931	15.82721	16.56674	16.07631	17.44964	16.93322	16.81265	16.31547	16.81265	16.31547	22.12693	21.47242	22.12693	21.47242	22.36603	21.7041
380700	3733100	57.76%	18.58773	17.66202	18.58773	17.66202	18.90244	17.95636	19.90609	18.91114	19.1754	18.21907	19.1754	18.21907	25.17471	23.92669	25.17471	23.92669	25.46051	24.19562
381200	3733100	58.75%	21.897206	21.22982	21.89721	21.22982	22.29723	21.61709	23.47503	22.75898	22.60552	21.9158	22.60552	21.9158	29.60469	28.64425	29.60469	28.64425	29.95892	28.98628
381700	3733100	55.55%	25.416123	23.99416	25.41612	23.99416	25.90955	24.45632	27.27243	25.74409	26.25517	24.78599	26.25517	24.78599	34.30822	32.39158	34.30822	32.39158	34.73695	32.79443
382200	3733100	60.53%	22.394813	20.86976	22.39481	20.86976	22.80397	21.24546	24.0134	22.37419	23.13528	21.55946	23.13528	21.55946	30.241055	28.18396	30.24106	28.18396	30.60646	28.52165
382700	3733100	74.39%	17.300896	16.1966	17.3009	16.1966	17.56422	16.43831	18.51492	17.33007	17.87068	16.7309	17.87068	16.7309	23.401988	21.90954	23.40199	21.90954	23.6578	22.14677
383200	3733100	73.29%	14.347424	13.66716	14.34742	13.66716	14.52106	13.83215	15.32428	14.59785	14.82168	14.12019	14.82168	14.12019	19.431419	18.50762	19.43142	18.50762	19.62177	18.68898
384700	3733100	62.34%	11.632062	11.2238	11.63206	11.2238	11.72514	11.31599	12.39284	11.95965	12.02022	11.59882	12.02022	11.59882	15.775911	15.21966	15.77591	15.21966	15.90748	15.34788
385200	3733100	60.77%	11.272134	10.85623	11.27213	10.85623	11.35835	10.9387	12.00634	11.56361	11.64719	11.21957	11.64719	11.21957	15.292585	14.72417	15.29259	14.72417	15.4179	14.845
380200	3733600	50.04%	16.559226	16.07793	16.55923	16.07793	16.8254	16.3373	17.72123	17.20696	17.07356	16.57795	17.07356	16.57795	22.45573	21.80107	22.45573	21.80107	22.70151	22.04036
380700	3733600	52.11%	19.392768	18.82617	19.39277	18.82617	19.73229	19.15634	20.77718	20.17042	20.01048	19.42566	20.01048	19.42566	26.11159	25.36548	26.11159	25.36548	26.414	25.65956
381200	3733600	51.99%	23.056103	22.47431	23.0561	22.47431	23.48691	22.89659	24.72553	24.10314	23.8072	23.20619	23.8072	23.20619	31.15431	30.36705	31.15431	30.36705	31.53296	30.73735
381700	3733600	66.74%	26.9387	26.10056	26.9387	26.10056	27.4808	26.62746	28.92049	28.02236	27.83228	26.96843	27.83228	26.96843	36.342408	35.2062	36.34241	35.2062	36.8071	35.65759
382200	3733600	62.18%	21.121183	20.4864	21.12118	20.4864	21.50134	20.85698	22.64352	21.9646	21.81837	21.16395	21.81837	21.16395	28.529225	27.66791	28.52923	27.66791	28.87086	28.00034
382700	3733600	78.18%	16.265152	15.39425	16.26515	15.39425	16.50885	15.62124	17.40315	16.46921	16.79853	15.90029	16.79853	15.90029	22.008383	20.82943	22.00838	20.82943	22.24652	21.05323
383200	3733600	70.67%	13.674842	13.08886	13.67484	13.08886	13.84106	13.24736	14.6055	13.97965	14.12377	13.51993	14.12377	13.51993	18.526549	17.73017	18.52655	17.73017	18.70778	17.90362
383700	3733600	70.53%	12.443479	11.8514	12.44348	11.8514	12.57285	11.97294	13.27578	12.6434	12.85296	12.24282	12.85296	12.24282	16.869952	16.06528	16.86995	16.06528	17.02421	16.2117
384200	3733600	66.14%	11.381085	11.01813	11.38109	11.01813	11.48022	11.11616	12.12946	11.74443	11.75607	11.38243	11.75607	11.38243	15.440685	14.94428	15.44069	14.94428	15.57245	15.07311
384700	3733600	68.52%	10.753695	10.44971	10.7537	10.44971	10.83659	10.53221	11.45359	11.13141	11.10827	10.79514	11.10827	10.79514	14.595676	14.17996	14.59568	14.17996	14.71493	14.29697
388700	3733600	51.76%	8.763289	8.372909	8.763289	8.372909	8.808932	8.417539	9.318163	8.903945	9.050233	8.647682	9.050233	8.647682	11.912155	11.37951	11.91216	11.37951	11.99813	11.46228
389200	3733600	50.68%	8.473234	8.149235	8.473234	8.149235	8.514754	8.189826	9.007464	8.663836	8.749042	8.415634	8.749042	8.415634	11.522924	11.07953	11.52292	11.07953	11.60446	11.15848
380200	3734100	47.01%	17.179051	16.58898	17.17905	16.58898	17.4656	16.86693	18.39292	17.76206	17.71679	17.10869	17.71679	17.10869	23.28108	22.47951	23.28108	22.47951	23.54202	22.7322
380700	3734100	45.81%	20.451171	19.61604	20.45117	19.61604	20.82019	19.96963	21.92046	21.02478	21.10866	20.2458	21.10866	20.2458	27.66114	26.53367	27.66114	26.53367	27.98892	26.84761
381200	3734100	43.06%	25.34196	24.70526	25.34196	24.70526	25.84048	25.19182	27.1965	26.51358	26.17589	25.51826	26.17589	25.51826	34.20952	33.34963	34.20952	33.34963	34.63974	33.7693
383200	3734100	64.53%	13.430512	12.85255	13.43051	12.85255	13.59226	13.00464	14.34295	13.7237	13.86958	13.26739	13.86958	13.26739	18.200411	17.42029	18.20041	17.42029	18.37733	17.58085
383700	3734100	67.18%	12.074273	11.54183	12.07427	11.54183	12.20127	11.66012	12.88204	12.31178	12.46886	11.91873	12.46886	11.91873	16.374288	15.65478	16.37429	15.65478	16.52419	15.79651
385700	3734100	62.31%	9.830733	9.321074	9.830733	9.321074	9.897664	9.380417	10.46393	9.91886	10.15284	9.627167	10.15284	9.627167	13.35284	12.66172	13.35284	12.66172	13.45709	12.75867
388200	3734100	52.11%	8.95445	8.547445	8.95445	8.547445	8.997605	8.589811	9.519361	9.087366	9.248611	8.827891	9.248611	8.827891	12.172125	11.61886	12.17213	11.61886	12.25845	11.70177
389700	3734100	53.22%	8.114756	7.702814	8.114756	7.702814	8.149612	7.73696	8.622343	8.185198	8.376567	7.950799	8.376567	7.950799	11.043445	10.4833	11.04345	10.4833	11.11866	10.55511
380200	3734600	46.84%	17.827621	17.34324	17.82762	17.34324	18.13368	17.64357	19.09473	18.5779	18.39075	17.89172	18.39075	17.89172	24.14373	23.48463	24.14373	23.48463	24.41982	23.75459
380700	3734600	50.83%	21.564942	21.15028	21.56494	21.15028	21.96771	21.54803	23.12478	22.68235	22.2625	21.83559	22.2625	21.83559	29.150101	28.58542	29.1501	28.58542	29.50333	28.93332
381200	3734600	49.12%	27.002255	26.34025	27.00226	26.34025	27.54837	26.87415	28.98927	28.27936	27.89365	27.20969	27.89365	27.20969	36.435442	35.53667	36.43544	35.53667	36.90178	35.99202
381700	3734600	54.03%	28.343311	27.67964	28.34331	27.67964	28.92973	28.25369	30.44048	29.7286	29.28742	28.60147	29.28742	28.60147	38.21868	37.3236	38.21868	37.3236	38.70892	37.8102
382700	3734600	56.86%	14.894615	14.19269	14.89462	14.19269	15.11193	14.39532	15.93147	15.17743	15.37891	14.65342	15.37891	14.65342	20.166371	19.22004	20.16637	19.22004	20.38076	19.42206
383200	3734600	71.76%	12.572855	12.21427	12.57286	12.21427	12.72741	12.3654	13.42809	13.04561	12.98039	12.60965	12.98039	12.60965	17.043537	16.5575	17.04354	16.5575	17.21005	16.71971
383700	3734600	65.17%	11.648631	11.19603	11.64863	11.19603	11.77	11.31242	12.42615	11.94272	12.02608	11.55735	12.02608	11.55735	15.804626	15.19379	15.80463	15.19379	15.94808	15.33126
384700	3734600	70.21%	10.003927	9.777132	10.00393	9.777132	10.08632	9.859022	10.65663	10.41635	10.3273	10.0945	10.3273	10.0945	13.588471	13.27675	13.58847	13.27675	13.70075	13.38741
387700	3734600	59.76%	8.612445	8.341603	8.612445	8.341603	8.651119	8.381962	9.15307	8.867539	8.892803	8.614278	8.892803	8.614278	11.714439	11.34181	11.71444	11.34181	11.79557	11.42205
388700	3734600	56.47%	8.304385	7.794067	8.304385	7.794067	8.340013	7.829685	8.824718	8.28295	8.575296	8.045208	8.575296	8.045208	11.295203	10.60638	11.2952	10.60638	11.37272	10.67961
389200	3734600	55.90%	7.91501	7.598298	7.91501	7.598298	7.948286	7.630348	8.409446	8.073109	8.169845	7.843234	8.169845	7.843234	10.77322	10.34145	10.77322	10.34145	10.84612	10.41154
389700	3734600	54.77%	7.712614	7.48459	7.712614	7.48459	7.742128	7.515521	8.192072	7.951702	7.959749	7.725296	7.959749	7.725296	10.502064	10.18824	10.50206	10.18824	10.57143	10.25686
380200	3735100	46.05%	18.943745	17.83753	18.94375	17.83753	19.28241	18.15333	20.30109	19.11323	19.54785	18.40561	19.54785	18.40561	25.634461	24.14141	25.63446	24.14141	25.93552	24.42322
380700	3735100	49.75%	22.332927	21.47495	22.33293	21.47495	22.76202	21.88723	23.95783	23.037	23.0597	22.17324	23.0597	22.17324	30.171207	29.0138	30.17121	29.0138	30.54374	29.37167
381200	3735100	55.01%	25.932098	25.13947	25.9321	25.13947	26.45644	25.64709	27.84039	26.98879	26.78857	25.96942	26.78857	25.96942	34.990788	33.92228	34.99079	33.92228	35.4386	34.356
381700	3735100	59.87%	27.03372	26.08793	27.03372	26.08793	27.58564	26.62512	29.02643	28.01599	27.92719	26.95518	27.92719	26.95518	36.457662	35.18285	36.44926	35.18285	36.92265	35.63898
383200	3735100	57.62%	12.597566	12.03957	12.59757	12.02502	12.75471	12.17242	13.45534	12.84194	13.00365	12.41232	13.00365	12.41232	17.080396	16.30645	17.0804	16.30645	17.24791	16.46428
383700	3735100	76.73%	11.505411	10.9867	11.50541	10.9867	11.63298	11.10761	12.27791	11.72358	11.87599	11.34	11.87599	11.34	15.61026	14.90707	15.61026	14.90707	15.75532	15.045
384700	3735100	68.45%	9.705026	9.433682	9.705026	9.433682	9.787472	9.514262	10.33911	10.05081	10.01608	9.737599	10.01608	9.737599	13.186542	12.81426	13.18654	12.81426	13.29619	12.92136
387700	3735100	59.97%	8.249544	7.888669	8.249544	7.888669	8.285559	7.922791	8.766112	8.382403	8.516204	8.143583	8.516204	8.143583	11.225494	10.73483	11.22549	10.73483	11.30233	10.80813
388700	3735100	59.49%	7.903906	7.647424	7.903906	7.647424	7.935188	7.68027	8.396441	8.125925	8.158738	7.894622	8.158738	7.894622	10.758529	10.40645	10.75853	10.40645	10.83045	10.47742
389200	3735100	56.92%	7.613046	7.303684	7.613046	7.303684	7.642503	7.334355	8.086652	7.75933	7.857365	7.536928	7.857365	7.536928	10.365492	9.945198	10.36549	9.945198	10.43419	10.01207
389700	3735100	56.15%	7.368742	7.087567	7.368742	7.087567	7.395486	7.114536	7.825439	7.527813	7.603573	7.313885	7.603573	7.313885	10.037477	9.652723	10.03748	9.652723	10.10279	9.71624
380200	3735600	51.65%	18.721098	18.22654	18.7211	18.22654	19.06484	18.56138	20.06956	19.53968	19.32127	18.81141	19.32127	18.81141	25.320898	24.65095	25.3209	24.65095	25.62357	24.9458
380700	3735600	54.52%	20.873173	20.45316	20.87317	20.45316	21.27632	20.84919	22.39329	21.94349	21.55246	21.11931	21.55246	21.11931	28.197736	27.62861	28.19774	27.62861	28.54695	27.97136
381200	3735600	58.62%	23.43235	22.96614	23.43235	22.96614	23.90123	23.42712	25.1523	24.65321	24.20287	23.72244	24.20287	23.72244	31.628159	30.29851	31.62816	30.29851	32.02972	30.69544
381700	3735600	62.25%	25.169561	24.25444	25.16956	24.25444	25.68187	24.7482	27.02489	26.04261	26.0036	25.05891	26.0036	25.05891	33.953621	32.71752	33.95362	32.71752	34.39046	33.13869
382700	3735600	64.17%	18.698539	16.96549	18.69854	16.96549	19.02561	17.25632	20.03645	18.43305	19.30613	17.51959	19.30613	17.51959	25.253491	22.86038	25.25349	22.86038	25.55419	23.19473
383200	3735600	73.07%	13.556262	12.92004	13.55626	12.72996	13.75125	12.89696	14.49733	13.59846	13.99485	13.13002	13.99485	13.13002	18.360757	17.23061	18.34856	17.23061	18.55403	17.40946
383700	3735600	68.91%	11.730295	10.88652	11.7303	10.88652	11.87382	11.01358	12.52694	11.62135	12.10784	11.23577	12.10784	11.23577	15.907504	14.76952	15.9075	14.76952	16.06202	14.90962
384200	3735600	75.45%	10.454327	10.19404	10.45433	10.19404	10.56234	10.30073	11.15004	10.87372	10.78831	10.52086	10.78831	10.52086	14.194955	13.83824	14.19496	13.77864	14.30298	13.90078
384700	3735600	68.91%	9.816822	9.494715	9.816822	9.494715	9.905913	9.580603	10.46162	10.11857	10.12999	9.798899	10.12999	9.798899	13.337999	12.89779	13.338	12.89779	13.45144	13.00761
385200	3735600	65.00%	9.319559	8.937113	9.319559	8.937113	9.393448	9.008225	9.924784	9.517688	9.617967	9.223325	9.617967	9.223325	12.666695	12.14661	12.6667	12.14661	12.76932	12.24517
385700	3735600	63.91%	8.81703	8.526295	8.81703	8.526295	8.878108	8.585057	9.383644	9.074119	9.099398	8.799672	9.099398	8.799672	11.989097	11.59329	11.9891	11.59329	12.08185	11.6829
386700	3735600	59.37%	8.420259	8.061813	8.420259	8.061813	8.465055	8.105221	8.952412	8.571577	8.690646	8.320381	8.690646	8.320381	11.456575	10.96916	11.45658	10.96916	11.53861	11.0479
388200	3735600	60.17%	7.637531	7.337865	7.637531	7.337865	7.66799	7.368379	8.113093	7.795785	7.882016	7.57337	7.882016	7.57337	10.399534	9.989458	10.39953	9.989458	10.46879	10.05672
388700	3735600	59.97%	7.604316	7.359831	7.604316	7.359831	7.630794	7.389136	8.075005	7.818285	7.847142	7.59611	7.847142	7.59611	10.358034	10.02	10.35803	10.02	10.42496	10.08686
389200	3735600	59.86%	7.472754	7.081485	7.472754	7.081485	7.499479	7.109825	7.936059	7.522006	7.712274	7.30663	7.712274	7.30663	10.17651	9.64567	10.17651	9.64567	10.24279	9.709624
380200	3736100	57.13%	18.091283	17.3584	18.09128	17.3584	18.4237	17.67651	19.39438	18.6084	18.67071	17.9153	18.67071	17.9153	24.46964	23.47733	24.46996	23.47733	24.76246	23.75778
380700	3736100	59.81%	20.255466	19.89271	20.25547	19.89271	20.64243	20.27629	21.7273	21.34083	20.91329	20.53987	20.91329	20.53987	27.368852	26.87404	27.36885	26.87404	27.70529	27.20649
381200	3736100	65.96%	21.559279	20.79122	21.55928	20.79122	21.98019	21.19698	23.13381	22.30963	22.26531	21.47235	22.26531	21.47235	29.112491	28.00455	29.11249	27.95725	29.47628	28.42568
381700	3736100	67.87%	22.926548	22.04507	22.92655	22.04507	23.38279	22.48369	24.60848	23.66249	23.683	22.77336	23.683	22.77336	30.941597	29.75011	30.9416	29.75011	31.33366	30.12725
382200	3736100	72.42%	22.087944	21.33013	22.08794	21.33013	22.51995	21.74808	23.70369	22.89109	22.81816	22.03568	22.81816	22.03568	29.811262	28.78716	29.81126	28.78716	30.18565	29.14913
382700	3736100	66.47%	18.368085	16.91704	18.36809	16.91704	18.69915	17.21476	19.6913	18.13049	18.97117	17.47128	18.97117	17.47128	24.817285	22.8638	24.81729	22.8638	25.11391	23.13328
383700	3736100	65.38%	12.041912	11.38561	12.04191	11.38561	12.19973	11.53249	12.86677	12.16357	12.42931	11.7507	12.42931	11.7507	16.323929	15.43815	16.32393	15.43815	16.4876	15.59157
384200	3736100	66.66%	10.588937	9.873409	10.58894	9.873409	10.70731	9.97794	11.29959	10.53191	10.92682	10.18795	10.92682	10.18795	14.372923	13.40647	14.37292	13.40647	14.50629	13.52783
384700	3736100	75.29%	9.713751	9.424804	9.713751	9.424804	9.807933	9.51614	10.35546	10.04778	10.02233	9.725427	10.02233	9.725427	13.196919	12.73817	13.19692	12.71814	13.31189	12.82861
385200	3736100	66.45%	9.174326	8.796981	9.174326	8.796981	9.251286	8.870879	9.772497	9.370685	9.466532	9.077381	9.466532	9.077381	12.469939	11.95657	12.46994	11.95657	12.57275	12.05524
385700	3736100	62.93%	8.579956	8.29834	8.579956	8.29834	8.643044	8.358872	9.133206	8.833441	8.852754	8.563289	8.852754	8.563289	11.668653	11.28365	11.66865	11.28365	11.76033	11.37229
386200	3736100	58.88%	8.214041	8.007499	8.214041	8.007499	8.266342	8.058831	8.738492	8.519112	8.476138	8.26338	8.476138	8.26338	11.174095	10.89214	11.1741	10.89214	11.25805	10.97423
386700	3736100	59.27%	8.227338	7.860577	8.227338	7.860577	8.273856	7.904914	8.748947	8.35856	8.490801	8.11131	8.490801	8.11131	11.1939	10.69704	11.1939	10.69704	11.27528	10.77455
387700	3736100	58.03%	7.646708	7.405664	7.646708	7.405664	7.679692	7.437958	8.124392	7.868535	7.891076	7.642334	7.891076	7.642334	10.411382	10.08297	10.41138	10.08297	10.48185	10.1514
388200	3736100	58.15%	7.477615	7.216406	7.477615	7.216406	7.505667	7.245046	7.941764	7.66519	7.71619	7.445926	7.71619	7.445926	10.184617	9.829377	10.18462	9.829377	10.25139	9.894444
388700	3736100	54.38%	7.265362	6.926645	7.265362	6.926645	7.291513	6.952577	7.715408	7.356091	7.496567	7.14611	7.496567	7.14611	9.897475	9.437476	9.897475	9.437476	9.961698	9.498997
389700	3736100	52.33%	6.756067	6.468994	6.756067	6.468994	6.77962	6.493075	7.173475	6.869265	6.969231	6.671621	6.969231	6.671621	9.208049	8.81897	9.208049	8.81897	9.26703	8.875915
380200	3736600	58.15%	17.630634	17.18429	17.63063	17.18429	17.951	17.4986	18.89807	18.42145	18.19502	17.73573	18.19502	17.73573	23.849916	23.24193	23.84992	23.24193	24.13316	23.51922

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	2026_ALT1_CAAQS	2026_ALT1_NAAQS	2026_NP_CAAQS	2026_NP_NAAQS	2026_ALT3_CAAQS	2026_ALT3_NAAQS	2026_ALT4_CAAQS	2026_ALT4_NAAQS	2026_ALT5_CAAQS	2026_ALT5_NAAQS	2026_PP_CAAQS	2026_PP_NAAQS	2033_ALT1_CAAQS	2033_ALT1_NAAQS	2033_NP_CAAQS	2033_NP_NAAQS	2033_ALT3_CAAQS	2033_ALT3_NAAQS
380700	3736600	53.40%	18.91121	18.46439	18.91121	18.46439	19.25874	18.80891	20.27404	19.79954	19.5188	19.06077	19.5188	19.06077	25.55869	24.85465	25.55869	24.85465	25.86449	25.15509
381200	3736600	57.86%	20.689717	20.03125	20.68972	20.03125	21.0835	20.41429	22.19269	21.48817	21.36366	20.68541	21.36366	20.68541	27.952292	27.05797	27.95229	27.05797	28.29571	27.39165
381700	3736600	68.17%	20.874389	19.92315	20.87439	19.92315	21.28046	20.30893	22.39831	21.37645	21.55966	20.57713	21.55966	20.57713	28.18536	26.90187	28.18536	26.90187	28.53713	27.23678
382200	3736600	75.53%	19.872921	19.1645	19.87292	19.1645	20.24986	19.52699	21.31726	20.55687	20.52569	19.79438	20.52569	19.79438	26.838009	25.88113	26.83801	25.88113	27.16819	26.19918
382700	3736600	63.91%	17.335236	15.91479	17.33524	15.91479	17.64313	16.19055	18.58029	17.0525	17.90219	16.43306	17.90219	16.43306	23.429044	21.51839	23.42904	21.51839	23.7063	21.76911
384200	3736600	58.67%	10.693042	10.06843	10.69304	10.06843	10.82197	10.1856	11.41707	10.74699	11.03431	10.38878	11.03431	10.38878	14.508232	13.66554	14.50823	13.66554	14.64754	13.79444
384700	3736600	62.87%	9.578557	8.997849	9.578557	8.997849	9.676417	9.084985	10.21444	9.591753	9.8819	9.282236	9.8819	9.282236	13.012147	12.22748	13.01215	12.22748	13.12779	12.33364
385200	3736600	71.62%	8.873539	8.546373	8.873539	8.546373	8.950579	8.620222	9.453372	9.104577	9.154518	8.816953	9.154518	8.816953	12.063005	11.61856	12.06301	11.61856	12.16341	11.71507
385700	3736600	70.17%	8.386204	8.181217	8.386204	8.181217	8.450302	8.244296	8.92815	8.710547	8.651304	8.440702	8.651304	8.440702	11.406953	11.12592	11.40695	11.12592	11.49745	11.21465
386200	3736600	65.75%	8.01859	7.769743	8.01859	7.769743	8.072092	7.821255	8.531725	8.26658	8.272837	8.01562	8.272837	8.01562	10.910155	10.57279	10.91016	10.57279	10.993	10.6528
386700	3736600	64.95%	7.753374	7.518914	7.753374	7.518914	7.798646	7.562654	8.245323	7.995602	7.999762	7.756941	7.999762	7.756941	10.55213	10.23509	10.55213	10.23509	10.62915	10.30953
387200	3736600	61.06%	7.611719	7.390526	7.611719	7.390526	7.65115	7.429158	8.091104	7.856085	7.853027	7.624417	7.853027	7.624417	10.363736	10.0632	10.36374	10.0632	10.43677	10.13421
387700	3736600	58.53%	7.473241	7.255896	7.473241	7.255896	7.506435	7.288409	7.940367	7.709578	7.710838	7.486423	7.710838	7.486423	10.177193	9.881381	10.17719	9.881381	10.24631	9.948587
388200	3736600	58.34%	7.352182	7.119549	7.352182	7.119549	7.381916	7.148156	7.809625	7.562328	7.585505	7.345279	7.585505	7.345279	10.015073	9.698766	10.01507	9.698766	10.08155	9.762998
388700	3736600	56.34%	7.115596	6.885204	7.115596	6.885204	7.141158	6.910622	7.5559	7.311574	7.340621	7.102502	7.340621	7.102502	9.696459	9.383054	9.696459	9.383054	9.75906	9.443877
389200	3736600	53.66%	6.886122	6.645159	6.886122	6.645159	6.908827	6.668277	7.310607	7.055633	7.103085	6.854631	7.103085	6.854631	9.386745	9.057336	9.386745	9.057336	9.446151	9.115289
389700	3736600	52.38%	6.760817	6.403032	6.760817	6.403032	6.781356	6.424758	7.176492	6.797524	6.974219	6.602741	6.974219	6.602741	9.216216	8.732142	9.216216	8.732142	9.273755	8.787301
380200	3737100	61.47%	17.091223	16.53753	17.09122	16.53753	17.39935	16.83787	18.3178	17.72613	17.63707	17.06655	17.63707	17.06655	23.124645	22.37235	23.12465	22.37235	23.39769	22.63781
380700	3737100	57.19%	17.918669	17.21285	17.91867	17.21285	18.24319	17.52646	19.20625	18.45174	18.49311	17.76677	18.49311	17.76677	24.238702	23.10902	24.2387	23.10902	24.52618	23.49658
381200	3737100	65.64%	19.135996	18.74653	19.136	18.74653	19.49299	19.09975	20.52054	20.1058	19.757	19.35687	19.757	19.35687	25.862414	25.33011	25.86241	25.33011	26.17607	25.63937
381700	3737100	72.11%	18.313321	17.71378	18.31332	17.71378	18.65874	18.04752	19.64148	18.99838	18.90964	18.29102	18.90964	18.29102	24.744195	23.93332	24.7442	23.93332	25.04647	24.22563
382200	3737100	76.61%	18.077527	17.13311	18.07753	17.13311	18.41118	17.44656	19.38404	18.36953	18.66541	17.69225	18.66541	17.69225	24.421417	23.15162	24.42142	23.15162	24.71661	23.42992
382700	3737100	67.72%	15.966616	15.16851	15.96662	15.16851	16.24399	15.42836	17.10801	16.25034	16.48512	15.66093	16.48512	15.66093	21.591198	20.51461	21.5912	20.51461	21.84276	20.75183
383200	3737100	68.46%	13.799979	12.91863	13.79998	12.91863	14.01748	13.11727	14.77052	13.82332	14.24514	13.33396	14.24514	13.33396	18.6816	17.49458	18.6816	17.49458	18.88748	17.68456
383700	3737100	70.75%	12.298725	11.29317	12.29873	11.29317	12.475	11.4473	13.15108	12.06991	12.69324	11.65321	12.69324	11.65321	16.665069	15.31197	16.66507	15.31197	16.83944	15.46794
384200	3737100	62.36%	10.876445	10.38025	10.87645	10.38025	11.01579	10.51045	11.61848	11.08614	11.22363	10.71031	11.22363	10.71031	14.751787	14.08328	14.75179	14.08328	14.89761	14.22076
384700	3737100	61.04%	9.64609	9.195887	9.64609	9.195887	9.752042	9.293674	10.29143	9.808736	9.95139	9.486362	9.95139	9.486362	13.099603	12.49151	13.0996	12.49151	13.21967	12.60427
385200	3737100	67.87%	8.781425	8.374237	8.781425	8.374237	8.861922	8.448251	9.357826	8.921898	9.058544	8.63802	9.058544	8.63802	11.937091	11.38634	11.93709	11.38634	12.03837	11.48149
387700	3737100	69.22%	7.370525	7.128966	7.370525	7.128966	7.405418	7.163154	7.832533	7.575968	7.604325	7.35457	7.604325	7.35457	10.037062	9.708998	10.03706	9.708998	10.10619	9.775969
388200	3737100	67.84%	6.949811	6.737427	6.949811	6.737427	6.979009	6.766292	7.382608	7.157172	7.169202	6.949451	7.169202	6.949451	9.468755	9.180473	9.468755	9.180473	9.531902	9.241846
388700	3737100	59.67%	6.937559	6.689571	6.937559	6.689571	6.963195	6.715248	7.367305	7.104163	7.156862	6.899585	7.156862	6.899585	9.453635	9.118175	9.453635	9.118175	9.515001	9.177541
389200	3737100	57.18%	6.818466	6.568078	6.818466	6.568078	6.840126	6.590952	7.238229	6.97334	7.033326	6.773611	7.033326	6.773611	9.294984	8.955441	9.294984	8.955441	9.353425	9.012446
389700	3737100	55.41%	6.677474	6.437954	6.677474	6.437954	6.69692	6.458308	7.08698	6.833991	6.886684	6.640089	6.886684	6.640089	9.106422	8.77793	9.106422	8.77793	9.162555	8.832894
380200	3737600	63.66%	16.027891	15.70176	16.02789	15.70176	16.31149	15.9819	17.17383	16.82648	16.53741	16.20251	16.53741	16.20251	21.694333	21.24791	21.69433	21.24791	21.94723	21.4972
380700	3737600	62.02%	16.667038	16.04466	16.66704	15.99186	16.96213	16.3313	17.85939	17.1948	17.19868	16.50399	17.19868	16.50399	22.555447	21.63588	22.55545	21.63588	22.81892	21.8902
381200	3737600	70.93%	17.601181	16.85135	17.60118	16.85135	17.92594	17.16075	18.87165	18.0666	18.17051	17.39629	18.17051	17.39629	23.794353	22.78195	23.79435	22.78195	24.08067	23.05531
381700	3737600	77.79%	17.222957	16.5741	17.22296	16.5741	17.53811	16.87703	18.46477	17.76885	17.78162	17.11162	17.78162	17.11162	23.281679	22.40499	23.28168	22.40499	23.56076	22.67334
382200	3737600	76.68%	16.484405	15.43417	16.48441	15.43417	16.77983	15.70584	17.66866	16.53939	17.01877	15.9336	17.01877	15.9336	22.287941	20.87253	22.28794	20.87253	22.55198	21.11722
382700	3737600	69.78%	14.830265	13.9666	14.83027	13.9666	15.08101	14.19834	15.885	14.9565	15.30934	14.41666	15.30934	14.41666	20.064406	18.90106	20.06441	18.90106	20.29414	19.11503
383200	3737600	70.94%	13.050827	12.26392	13.05083	12.26392	13.25311	12.44898	13.96568	13.11984	13.46977	12.65626	13.46977	12.65626	17.673982	16.61433	17.67398	16.61433	17.86664	16.7926
383700	3737600	61.98%	11.876949	11.16734	11.87695	11.16734	12.04685	11.32243	12.69946	11.93712	12.25671	11.52299	12.25671	11.52299	16.096299	15.1405	16.0963	15.1405	16.26431	15.29599
384200	3737600	72.22%	10.605085	9.783218	10.60509	9.783218	10.74093	9.901391	11.3282	10.44479	10.94237	10.09222	10.94237	10.09222	14.386346	13.28056	14.38635	13.28056	14.52824	13.40749
384700	3737600	59.40%	9.702452	9.208247	9.702452	9.208247	9.815417	9.311848	10.35588	9.825756	10.00953	9.49905	10.00953	9.49905	13.1722	12.50488	13.1722	12.50488	13.29612	12.62058
385200	3737600	64.67%	8.866609	8.478909	8.866609	8.478909	8.95509	8.561297	9.453456	9.038537	9.146295	8.746203	9.146295	8.746203	12.048686	11.52357	12.04869	11.52357	12.15446	11.62361
385700	3737600	55.94%	8.080412	7.890861	8.080412	7.890861	8.147004	7.956274	8.605278	8.403986	8.333901	8.139439	8.333901	8.139439	10.99207	10.73179	10.99207	10.73179	11.08128	10.8193
386200	3737600	63.28%	7.791433	7.523665	7.791433	7.523665	7.848771	7.578897	8.293071	8.00803	8.036556	7.760551	8.036556	7.760551	10.601824	10.23713	10.60182	10.23713	10.68458	10.31702
386700	3737600	67.67%	7.480235	7.189286	7.480235	7.189286	7.528866	7.235634	7.957601	7.647573	7.715955	7.415037	7.715955	7.415037	10.181528	9.787457	10.18153	9.787457	10.2579	9.86051
387200	3737600	64.87%	7.25485	7.010722	7.25485	7.010722	7.296875	7.051618	7.71438	7.454713	7.483571	7.230858	7.483571	7.230858	9.877754	9.547099	9.877754	9.547099	9.949315	9.616211
387700	3737600	65.58%	7.074236	6.839524	7.074236	6.839524	7.11	6.875608	7.518694	7.27792	7.296959	7.053995	7.296959	7.053995	9.63576	9.316946	9.63576	9.316946	9.702901	9.382428
388200	3737600	67.21%	6.971688	6.81081	6.971688	6.81081	7.002196	6.841672	7.406402	7.236316	7.190891	7.025303	7.190891	7.025303	9.499652	9.279028	9.499652	9.279028	9.563428	9.341919
388700	3737600	63.43%	6.749623	6.567095	6.749623	6.567095	6.775783	6.593463	7.168103	6.974769	6.961523	6.772912	6.961523	6.772912	9.199876	8.951254	9.199876	8.951254	9.259888	9.010025
389200	3737600	60.27%	6.69624	6.443875	6.69624	6.443875	6.718937	6.466137	7.109049	6.841037	6.905984	6.644454	6.905984	6.644454	9.130142	8.788475	9.130142	8.788475	9.187988	8.84409
389700	3737600	60.60%	6.548219	6.325155	6.548219	6.325155	6.567665	6.345511	6.949759	6.714014	6.752409	6.522149	6.752409	6.522149	8.931994	8.627249	8.931994	8.627249	8.987034	8.681134
380200	3738100	67.84%	15.060866	14.57604	15.06087	14.57604	15.32276	14.83001	16.13405	15.61522	15.53799	15.03868	15.53799	15.03868	20.391567	19.65259	20.39157	19.65259	20.62671	19.96121
380700	3738100	67.14%	15.751423	15.15121	15.75142	15.15121	16.02716	15.41681	16.87612	16.2335	16.25386	15.63523	16.25386	15.63523	21.318201	20.50409	21.3182	20.50409	21.56572	20.74247
381200	3738100	71.25%	15.969652	15.21365	15.96965	15.21365	16.25551	15.48358	17.11532	16.30337	16.48273	15.70232	16.48273	15.70232	21.60164	20.58107	21.60164	20.58107	21.85647	20.82252
381700	3738100	75.06%	15.916107	15.33919	15.91611	15.33919	16.19871	15.61056	17.05691	16.43803	16.42908	15.83416	16.42908	15.83416	21.527321	20.74656	21.52732	20.74656	21.78039	20.99007
382200	3738100	75.45%	15.238235	14.22887	15.23824	14.22887	15.50233	14.47141	16.32605	15.24139	15.72966	14.68611	15.72966	14.68611	20.613731	19.25448	20.61373	19.25448	20.85297	19.47544
382700	3738100	72.07%	13.749651	13.24187	13.74965	13.24187	13.97559	13.45759	14.72221	14.17722	14.1908	13.6667	14.1908	13.6667	18.612834	17.92657	18.61283	17.92657	18.822	18.12721
383200	3738100	69.55%	12.47337	11.91369	12.47337	11.91369	12.66442	12.0933	13.34578	12.74471	12.87221	12.29376	12.87221	12.29376	16.89671	16.14224	16.89671	16.14224	17.07938	16.31509
383700	3738100	65.78%	11.209516	10.80511	11.20952	10.80511	11.366	10.95458	11.98252	11.54915	11.56581	11.14801	11.56581	11.14801	15.198733	14.65242	15.19873	14.65242	15.355	14.80224
384200	3738100	65.90%	10.421918	9.869195	10.42192	9.869195	10.5564	9.992872	11.13287	10.53958	10.75223	10.1808	10.75223	10.1808	14.1397	13.39468	14.1397	13.39468	14.2794	13.52491
384700	3738100	66.72%	9.465125	8.89086	9.465125	8.89086	9.574625	8.988681	10.10168	9.485043	9.763312	9.169857	9.763312	9.169857	12.853319	12.07902	12.85332	12.07902	12.97361	12.1893
385200	3738100	63.12%	8.861695	8.405898	8.861695	8.405898	8.954744	8.490734	9.451217	8.962593	9.140783	8.670056	9.140783	8.670056	12.040018	11.42412	12.04002	11.42412	12.14794	11.52469
385700	3738100	57.32%	8.394999	8.042486	8.394999	8.042486	8.471174	8.11266	8.945036	8.567537	8.658383	8.294847	8.658383	8.294847	11.415576	10.9379	11.41558	10.9379	11.51171	11.02862
386200	3738100	56.03%	7.630139	7.386275	7.630139	7.386275	7.687911	7.442169	8.122037	7.862553	7.868692	7.617609	7.868692	7.617609	10.384458	10.05174	10.38446	10.05174	10.46603	10.13076
386700	3738100	60.15%	7.39824	7.170913	7.39824	7.170913	7.447524	7.219015	7.870742	7.629007	7.629944	7.395141	7.629944	7.395141	10.072235	9.763248	10.07224	9.763248	10.14807	9.83686
387200	3738100	66.62%	7.265333	6.955816	7.265333	6.955816	7.309155	6.996803	7.726553	7.396214	7.493881	7.172957	7.493881	7.172957	9.892037	9.474742	9.892037	9.474742	9.964452	9.543264
387700	3738100	65.37%	6.934999	6.723568	6.934999	6.723568	6.971011	6.758916	7.370959	7.146214	7.152052	6.93295	7.152052	6.93295	9.448242	9.162114	9.448242	9.162114	9.51429	9.226161
388200	3738100	64.82%	6.794926	6.575138	6.794926	6.575138	6.826819	6.606492	7.219931	6.98652	7.008074	6.780713	7.008074	6.780713	9.258515	8.960162	9.258515	8.960162	9.321651	9.021353
388700	3738100	64.42%	6.686972	6.510323	6.686972	6.510323	6.714234	6.538096	7.102248	6.915287	6.896134	6.713405	6.896134	6.713405	9.112473	8.864324	9.112473	8.864324	9.172412	8.923055
389200	3738100	65.90%	6.610412	6.381088	6.610412	6.381088	6.633791	6.404787	7.018494	6.775339	6.81716	6.579225	6.81716	6.579225	9.013172	8.702833	9.013172	8.702833	9.070691	8.758643
389700	3738100	66.01%	6.480356	6.210472	6.480356	6.210472	6.500469	6.230574	6.878338	6.591896	6.682489	6.402395	6.682489	6.402395	8.838774	8.47397	8.838774	8.47397	8.89367	8.526633
380200	3738600	75.92%	13.926363	13.49588	13.92636	13.49588	14.16441	13.72654	14.9153	14.45439	14.36588	13.92208	14.36588	13.92208	18.861825	18.27813	18.86183	18.27813	19.07689	18.48656
380700	3738600	75.48%	14.272751	13.7533	14.27275	13.7533	14.51958	13.9899	15.2893	14.73187	14.72638	14.19012	14.72638	14.19012	19.322485	18.62076	19.32249	18.62076	19.54492	18.8344
381200	3738600	72.25%	14.51677	13.9585	14.51677	13.9585	14.76868	14.19968	15.5519	14.95298	14.98012	14.40381	14.98012	14.40381	19.647747	18.89368	19.64775	18.89368	19.87487	19.1114
381700	3738600	74.97%	14.558652	14.06698	14.55865	14.06698	14.80882	14.30796	15.59551	15.06837	15.02481	14.51761	15.02481	14.51761	19.703215	19.03769	19.70322	19.03769	19.92992	19.25644
382200	3738600	71.70%	14.13448	13.22451	14.13448	13.22451	14.37185	13.44317	15.1375	14.16022	14.58737	13.64691	14.58737	13.64691	19.131658	17.90527	19.13166	17.90527	19.34919	18.10675
382700	3738600	68.10%	13.068056	12.45678	13.06806	12.45678	13.27736	12.65416	13.98791	13.33215	13.48484	12.8542	13.48484	12.8542	17.689225	16.87189	17.68923	16.87189	17.88515	17.05744
383200	3738600	68.66%	11.955742	11.3636	11.95574	11.3636	12.13486	11.53168	12.78871	12.15334	12.33642	11.72379	12.33642	11.72379	16.201433	15.40385	16.20143	15.40385	16.37423	15.56671
383700	3738600	71.47%	10.743022	10.16444	10.74302	10.16444	10.89059	10.29997	11.48167	10.86015	11.08265	10.48451	11.08265	10.48451	14.571622	13.79209	14.57162	13.79209	14.71987	13.93011
384200	3738600	60.91%	10.122173	9.639852	10.12217	9.639852	10.25233	9.760377	10.81192	10.29412	10.44156	9.943101	10.44156	9.943101	13.736366	13.08594	13.73637	13.08594	13.87154	13.21279
384700	3738600	71.44%	9.439879	8.772061	9.439879	8.772061	9.551641	8.869319	10.0763	9.358441	9.73671	9.046136	9.73671	9.046136	12.818685	11.9197	12.81869	11.9197	12.93978	12.02864
385200	3738600	57.23%	8.674292	8.37032	8.674292	8.37032	8.764788	8.456311	9.250567	8.925331	8.946271	8.632184	8.946271	8.632184	11.78835	11.37735	11.78835	11.37735	11.89346	11.47801
385700	3738600	57.57%	8.268848	7.84593	8.268848	7.84593	8.347923	7.916967	8.813138	8.359577	8.527493	8.091094	8.527493	8.091094	11.243156	10.67118	11.24316	10.67118	11.3397	10.76076
386200	3738600	59.82%	7.762215	7.446789	7.762215	7.446789	7.826708	7.506825	8.266383	7.929231	8.004495	7.679254	8.004495	7.679254	10.561479	10.13338	10.56148	10.13338	10.6472	10.21472
386700	3738600	56.83%	7.313819	7.085028	7.313819	7.085028	7.364981	7.134445	7.782204	7.538817	7.541653	7.306191	7.541653	7.306191	9.958348	9.645999	9.958348	9.645999	10.03428	9.719576

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	2026_ALT1_CAAQS	2026_ALT1_NAAQS	2026_NP_CAAQS	2026_NP_NAAQS	2026_ALT3_CAAQS	2026_ALT3_NAAQS	2026_ALT4_CAAQS	2026_ALT4_NAAQS	2026_ALT5_CAAQS	2026_ALT5_NAAQS	2026_PP_CAAQS	2026_PP_NAAQS	2033_ALT1_CAAQS	2033_ALT1_NAAQS	2033_NP_CAAQS	2033_NP_NAAQS	2033_ALT3_CAAQS	2033_ALT3_NAAQS
387200	3738600	57.95%	6.978714	6.720642	6.978714	6.720642	7.021867	6.761533	7.421844	7.146753	7.196238	6.929548	7.196238	6.929548	9.505355	9.155487	9.505355	9.155487	9.575041	9.222161
387700	3738600	64.27%	6.790233	6.576288	6.790233	6.576288	6.828142	6.612884	7.218635	6.990939	7.001914	6.780754	7.001914	6.780754	9.251152	8.960903	9.251152	8.960903	9.316951	9.024464
388200	3738600	65.76%	6.701899	6.412747	6.701899	6.412747	6.73467	6.444218	7.121781	6.814141	6.911472	6.611865	6.911472	6.611865	9.132286	8.741236	9.132286	8.741236	9.195069	8.801102
388700	3738600	62.21%	6.43631	6.28071	6.43631	6.28071	6.463603	6.308819	6.839359	6.672113	6.636419	6.468788	6.636419	6.468788	8.775508	8.552841	8.775508	8.552841	8.833512	8.610043
389200	3738600	62.79%	6.480702	6.259921	6.480702	6.259921	6.505427	6.284814	6.881755	6.647784	6.669272	6.454266	6.669272	6.454266	8.819593	8.53246	8.819593	8.53246	8.876452	8.587951
389700	3738600	61.25%	6.352131	6.129616	6.352131	6.129616	6.373075	6.151459	6.742788	6.507371	6.549337	6.318835	6.549337	6.318835	8.665095	8.362824	8.665095	8.362824	8.719336	8.415759
380200	3739100	74.83%	12.871917	12.53338	12.87192	12.53338	13.08792	12.74339	13.78273	13.42008	13.27633	12.92727	13.27633	12.92727	17.440139	16.98151	17.44014	16.98151	17.63651	17.17261
380700	3739100	73.52%	13.591789	13.12474	13.59179	13.12474	13.82059	13.34577	14.5549	14.05487	14.02157	13.53976	14.02157	13.53976	18.409061	17.77658	18.40906	17.77658	18.61743	17.97782
381200	3739100	69.62%	13.736511	12.98474	13.73651	12.98474	13.96867	13.20111	14.71121	13.90365	14.17329	13.39654	14.17329	13.39654	18.599615	17.58556	18.59962	17.58556	18.81096	17.78379
381700	3739100	77.41%	13.342446	12.78693	13.34245	12.78693	13.56535	12.99858	14.28733	13.69116	13.76643	13.19322	13.76643	13.19322	18.067906	17.31722	18.06791	17.31722	18.2719	17.51173
382200	3739100	70.85%	13.067888	12.25783	13.06789	12.25783	13.28076	12.45301	13.98982	13.11941	13.48347	12.64709	13.48347	12.64709	17.698818	16.60577	17.69882	16.60577	17.89614	16.78845
382700	3739100	67.04%	12.338395	11.83484	12.3384	11.83484	12.53053	12.01809	13.20249	12.66302	12.72978	12.21037	12.72978	12.21037	16.718533	16.03662	16.71853	16.03662	16.90022	16.21043
383200	3739100	69.96%	11.555995	10.9341	11.556	10.9341	11.72682	11.093	12.35913	11.69163	11.9226	11.2792	11.9226	11.2792	15.664063	14.82649	15.66406	14.82649	15.82965	14.98156
383700	3739100	69.79%	10.380347	10.02282	10.38035	10.02282	10.52031	10.1569	11.09182	10.70885	10.70697	10.33748	10.70697	10.33748	14.084579	13.60167	14.08458	13.60167	14.2262	13.73776
384200	3739100	62.72%	9.7294	9.39385	9.7294	9.39385	9.85153	9.510379	10.38982	10.03042	10.0346	9.688116	10.0346	9.688116	13.209021	12.75519	13.20902	12.75519	13.33713	12.87811
384700	3739100	63.36%	9.157688	8.823379	9.157688	8.823379	9.264343	8.924697	9.773447	9.415526	9.444228	9.098947	9.444228	9.098947	12.43957	11.98744	12.43957	11.98744	12.55591	12.09871
385200	3739100	65.54%	8.66996	8.028478	8.66996	8.028478	8.761928	8.107484	9.246777	8.557926	8.941107	8.277923	8.941107	8.277923	11.782974	10.91852	11.78297	10.91852	11.88865	11.01302
385700	3739100	57.22%	7.984705	7.688734	7.984705	7.688734	8.060554	7.760015	8.509561	8.193002	8.233225	7.928236	8.233225	7.928236	10.859776	10.45792	10.85978	10.45792	10.9525	10.54638
386200	3739100	57.90%	7.753954	7.353846	7.753954	7.353846	7.821748	7.414695	8.259711	7.83111	7.995473	7.58267	7.995473	7.58267	10.549224	10.0075	10.54922	10.0075	10.63641	10.08845
386700	3739100	60.75%	7.352881	7.024083	7.352881	7.024083	7.408909	7.076337	7.826834	7.475962	7.581755	7.242655	7.581755	7.242655	10.009059	9.562438	10.00906	9.562438	10.08764	9.636858
387200	3739100	58.36%	6.922584	6.671629	6.922584	6.671629	6.967538	6.715135	7.36338	7.09642	7.137628	6.878421	7.137628	6.878421	9.429128	9.088136	9.429128	9.088136	9.499185	9.155648
387700	3739100	57.47%	6.635955	6.418777	6.635955	6.418777	6.673368	6.455417	7.054581	6.823712	6.84188	6.616993	6.84188	6.616993	9.042733	8.748527	9.042733	8.748527	9.107034	8.810765
388200	3739100	62.38%	6.501549	6.212194	6.501549	6.212194	6.535057	6.243957	6.909617	6.601383	6.703509	6.403366	6.703509	6.403366	8.861131	8.470733	8.861131	8.470733	8.922612	8.529017
388700	3739100	64.11%	6.393361	6.181765	6.393361	6.181765	6.422793	6.21004	6.792194	6.567249	6.591771	6.373495	6.591771	6.373495	8.716274	8.428114	8.716274	8.428114	8.774968	8.484758
389200	3739100	62.61%	6.201814	6.021545	6.201814	6.021545	6.226674	6.045724	6.58595	6.394648	6.393462	6.207964	6.393462	6.207964	8.459136	8.212516	8.459136	8.212516	8.514097	8.265958
389700	3739100	65.16%	6.198664	5.976422	6.198664	5.976422	6.220446	5.998354	6.580619	6.344951	6.383243	6.160206	6.383243	6.160206	8.446815	8.150569	8.446815	8.150569	8.500137	8.202287
380200	3739600	73.72%	12.410681	12.07114	12.41068	12.07114	12.61442	12.26915	13.28533	12.92172	12.79895	12.44882	12.79895	12.44882	16.821196	16.35992	16.8212	16.35992	17.00806	16.54156
380700	3739600	73.70%	12.335219	12.04277	12.33522	12.04277	12.53788	12.2411	13.20496	12.89237	12.72217	12.42098	12.72217	12.42098	16.716704	16.3193	16.7167	16.3193	16.90271	16.50121
381200	3739600	77.67%	12.411522	11.83709	12.41152	11.83709	12.61503	12.02897	13.28687	12.67043	12.80267	12.20989	12.80267	12.20989	16.816722	16.04028	16.81672	16.04028	17.00399	16.2178
381700	3739600	75.65%	12.52371	11.94194	12.52371	11.94194	12.72623	12.13397	13.40553	12.78179	12.91976	12.31859	12.91976	12.31859	16.967526	16.18222	16.96753	16.18222	17.15548	16.36057
382200	3739600	71.77%	12.066788	11.47378	12.06679	11.47378	12.25686	11.65225	12.91284	12.27661	12.44792	11.8358	12.44792	11.8358	16.352602	15.5512	16.3526	15.5512	16.53107	15.71972
382700	3739600	66.25%	11.607569	11.04496	11.60757	11.04496	11.78351	11.21071	12.41668	11.81356	11.97393	11.39303	11.97393	11.39303	15.735222	14.97465	15.73522	14.97465	15.90341	15.13382
383200	3739600	71.85%	10.939028	10.25061	10.93903	10.25061	11.09609	10.39495	11.70434	10.95689	11.28396	10.57162	11.28396	10.57162	14.835172	13.90796	14.83517	13.90796	14.9892	14.05049
383700	3739600	66.12%	10.100844	9.815596	10.10084	9.815596	10.23578	9.946692	10.79196	10.48715	10.41757	10.1233	10.41757	10.1233	13.708471	13.32151	13.70847	13.32151	13.84545	13.4546
384200	3739600	65.05%	9.395357	8.888605	9.395357	8.888605	9.510899	8.994407	10.03107	9.487353	9.688725	9.16522	9.688725	9.16522	12.75988	12.07587	12.75988	12.07587	12.88213	12.18961
384700	3739600	63.35%	8.972972	8.563771	8.972972	8.563771	9.07723	8.660633	9.575843	9.137114	9.25274	8.829981	9.25274	8.829981	12.190896	11.63834	12.1909	11.63834	12.30458	11.74537
385200	3739600	61.77%	8.573109	8.052571	8.573109	8.052571	8.665235	8.134473	9.144048	8.585274	8.840476	8.302296	8.840476	8.302296	11.652204	10.95057	11.6522	10.95057	11.75714	11.04658
385700	3739600	58.02%	7.836256	7.444124	7.836256	7.444124	7.911687	7.512153	8.351783	7.931257	8.079325	7.674599	8.079325	7.674599	10.658982	10.12879	10.65898	10.12879	10.75031	10.21368
386200	3739600	58.52%	7.547453	7.335927	7.547453	7.335927	7.613424	7.399733	8.039464	7.814017	7.781652	7.563804	7.781652	7.563804	10.270147	9.982006	10.27015	9.982006	10.35484	10.06422
386700	3739600	58.29%	7.306691	6.93743	7.306691	6.93743	7.365703	6.990619	7.779767	7.384573	7.5336	7.152536	7.5336	7.152536	9.945214	9.445107	9.945214	9.445107	10.02484	9.519235
387200	3739600	61.68%	6.970422	6.614035	6.970422	6.614035	7.01938	6.659262	7.416726	7.036371	7.186818	6.818331	7.186818	6.818331	9.492238	9.009894	9.492238	9.009894	9.564578	9.077722
387700	3739600	59.20%	6.643912	6.393808	6.643912	6.393808	6.684157	6.432383	7.064894	6.798481	6.849958	6.59095	6.849958	6.59095	9.05209	8.713858	9.05209	8.713858	9.117823	8.776827
388200	3739600	59.22%	6.338561	6.147161	6.338561	6.147161	6.371726	6.179784	6.736416	6.532965	6.534426	6.335922	6.534426	6.335922	8.64083	8.382177	8.64083	8.382177	8.700841	8.440352
388700	3739600	58.70%	6.255458	5.993456	6.255458	5.993456	6.285477	6.021748	6.646441	6.367214	6.449321	6.177495	6.449321	6.177495	8.528077	8.174793	8.528077	8.174793	8.586056	8.229787
389200	3739600	64.86%	6.113886	5.912911	6.113886	5.912911	6.139936	5.938212	6.493535	6.279947	6.302531	6.094686	6.302531	6.094686	8.338887	8.0661	8.338887	8.0661	8.393774	8.119096
389700	3739600	62.10%	5.969821	5.742933	5.969821	5.742933	5.992564	5.765145	6.338618	6.097521	6.15375	5.918477	6.15375	5.918477	8.144634	7.83785	8.144634	7.83785	8.196845	7.887967
380200	3740100	73.74%	11.983037	11.48217	11.98304	11.48217	12.17532	11.66476	12.8242	12.2868	12.35687	11.83957	12.35687	11.83957	16.153568	15.56679	16.15357	15.56679	16.33016	15.73634
380700	3740100	72.90%	11.659654	11.29719	11.65965	11.29719	11.84581	11.47774	12.47765	12.08974	12.02388	11.64969	12.02388	11.64969	15.807893	15.31723	15.80789	15.31723	15.9808	15.4847
381200	3740100	78.34%	11.679069	11.13254	11.67907	11.13254	11.86504	11.30769	12.49841	11.91195	12.04501	11.48088	12.04501	11.48088	15.832165	15.0937	15.83217	15.0937	16.00533	15.25756
381700	3740100	74.89%	11.70612	11.20495	11.70612	11.20495	11.88951	11.38002	12.52565	11.98886	12.07403	11.55639	12.07403	11.55639	15.868406	15.19078	15.86841	15.19078	16.04064	15.35529
382200	3740100	71.15%	11.293273	10.8089	11.29327	10.8089	11.4657	10.97222	12.08061	11.56131	11.64741	11.14782	11.64741	11.14782	15.313201	14.65755	15.3132	14.65755	15.47699	14.8135
382700	3740100	66.35%	10.871966	10.42992	10.87197	10.42992	11.03196	10.58244	11.62588	11.15249	11.21295	10.75695	11.21295	10.75695	14.745622	14.1468	14.74562	14.1468	14.90038	14.29474
383200	3740100	73.86%	10.324125	9.908832	10.32413	9.908832	10.4687	10.04775	11.03481	10.59086	10.64711	10.21823	10.64711	10.21823	13.998392	13.44552	13.99839	13.44552	14.14763	13.58395
383700	3740100	64.43%	9.686602	9.339904	9.686602	9.339904	9.814617	9.461645	10.34797	9.976358	9.98881	9.631	9.98881	9.631	13.150384	12.68139	13.15038	12.68139	13.28077	12.80622
384200	3740100	68.33%	8.993168	8.55794	8.993168	8.55794	9.101658	8.658278	9.599851	9.132977	9.27272	8.822948	9.27272	8.822948	12.217656	11.63039	12.21766	11.63039	12.3334	11.7389
384700	3740100	65.74%	8.665241	8.378509	8.665241	8.378509	8.763496	8.472587	9.245361	8.938644	8.934028	8.637882	8.934028	8.637882	11.77732	11.38927	11.77732	11.38927	11.88563	11.49344
385200	3740100	64.63%	8.346778	7.990607	8.346778	7.990607	8.435671	8.073407	8.901745	8.520099	8.605913	8.237932	8.605913	8.237932	11.347574	10.86639	11.34757	10.86639	11.44912	10.96231
385700	3740100	63.64%	7.784537	7.330923	7.784537	7.330923	7.862096	7.398873	8.298288	7.810971	8.025539	7.556863	8.025539	7.556863	10.587995	9.97635	10.588	9.97635	10.67992	10.06022
386200	3740100	56.80%	7.380374	7.07384	7.380374	7.07384	7.445171	7.133032	7.861438	7.532865	7.608601	7.292267	7.608601	7.292267	10.044313	9.62964	10.04431	9.62964	10.1271	9.707493
386700	3740100	60.54%	7.204825	6.936329	7.204825	6.936329	7.263299	6.99114	7.671343	7.384302	7.428056	7.150755	7.428056	7.150755	9.807454	9.443979	9.807454	9.443979	9.886022	9.518772
387200	3740100	58.31%	6.944665	6.571229	6.944665	6.571229	6.996575	6.617688	7.391286	6.991737	7.159725	6.773793	7.159725	6.773793	9.456333	8.951516	9.456333	8.951516	9.529843	9.019574
387700	3740100	61.87%	6.635939	6.311616	6.635939	6.311616	6.679286	6.351109	7.058384	6.711787	6.841218	6.505391	6.841218	6.505391	9.040368	8.602736	9.040368	8.602736	9.10747	8.665421
388200	3740100	61.66%	6.347164	6.139883	6.347164	6.139883	6.383274	6.174014	6.747457	6.526221	6.543045	6.32822	6.543045	6.32822	8.651263	8.371679	8.651263	8.371679	8.712725	8.430517
388700	3740100	57.50%	6.122462	5.921422	6.122462	5.921422	6.152475	5.950568	6.505326	6.291272	6.311439	6.102499	6.311439	6.102499	8.347951	8.077348	8.347951	8.077348	8.40487	8.132123
389200	3740100	57.14%	5.979531	5.785129	5.979531	5.785129	6.006192	5.810187	6.351451	6.144213	6.16342	5.962222	6.16342	5.962222	8.156172	7.893235	8.156172	7.893235	8.210324	7.945086
389700	3740100	62.50%	5.835008	5.647093	5.835008	5.647093	5.858375	5.668897	6.195922	5.995664	6.013711	5.819508	6.013711	5.819508	7.962276	7.707498	7.962276	7.707498	8.013667	7.756724
380200	3740600	73.10%	11.256605	10.7575	11.25661	10.7575	11.43205	10.92325	12.04252	11.50708	11.6054	11.09019	11.6054	11.09019	15.270138	14.48282	15.27014	14.48282	15.43438	14.63696
380700	3740600	73.37%	10.822197	10.46028	10.8222	10.46028	10.99012	10.62148	11.5774	11.18942	11.15792	10.78461	11.15792	10.78461	14.680519	14.19069	14.68052	14.19069	14.83813	14.3424
381200	3740600	74.51%	11.166262	10.48354	11.16626	10.48354	11.33963	10.64187	11.94605	11.21231	11.51432	10.80927	11.51432	10.80927	15.143704	14.22271	15.1437	14.22271	15.30669	14.37334
381700	3740600	77.83%	10.79594	10.45055	10.79594	10.45055	10.96014	10.60896	11.54751	11.17776	11.1323	10.77634	11.1323	10.77634	14.643915	14.17542	14.64392	14.17542	14.7997	14.32604
382200	3740600	70.67%	10.611986	10.2313	10.61199	10.2313	10.76895	10.38194	11.34776	10.94019	10.9427	10.55008	10.9427	10.55008	14.397032	13.88109	14.39703	13.88109	14.54807	14.02638
382700	3740600	68.29%	10.307937	9.931571	10.30794	9.931571	10.4558	10.07298	11.01952	10.61654	10.62922	10.24138	10.62922	10.24138	13.987315	13.47673	13.98732	13.47673	14.1317	13.61545
383200	3740600	73.38%	9.807553	9.437902	9.807553	9.437902	9.941256	9.56654	10.47964	10.08453	10.11253	9.731017	10.11253	9.731017	13.314186	12.81319	13.31419	12.81319	13.44802	12.94188
383700	3740600	65.11%	9.327176	8.954803	9.327176	8.954803	9.448333	9.068872	9.962186	9.562824	9.616917	9.232619	9.616917	9.232619	12.666443	12.16286	12.66644	12.16286	12.79071	12.28099
384200	3740600	68.63%	8.774736	8.410962	8.774736	8.410962	8.880263	8.510166	9.366241	8.976265	9.046796	8.670588	9.046796	8.670588	11.922605	11.43201	11.92261	11.43201	12.03523	11.53879
384700	3740600	62.87%	8.290484	7.864268	8.290484	7.864268	8.384594	7.949856	8.845315	8.387637	8.54675	8.105936	8.54675	8.105936	11.269797	10.69576	11.2698	10.69576	11.3733	10.79185
385200	3740600	64.30%	8.061048	7.724914	8.061048	7.724914	8.146678	7.804297	8.596579	8.236	8.31037	7.962882	8.31037	7.962882	10.961276	10.50787	10.96128	10.50787	11.05905	10.60006
385700	3740600	61.62%	7.657334	7.37603	7.657334	7.37603	7.732531	7.446236	8.161777	7.860177	7.89381	7.60301	7.89381	7.60301	10.416926	10.03737	10.41693	10.03737	10.5067	10.12259
386200	3740600	63.03%	7.484245	6.932657	7.484245	6.932657	7.551186	6.987548	7.972879	7.379952	7.715527	7.145296	7.715527	7.145296	10.18519	9.44241	10.18519	9.44241	10.26974	9.516896
386700	3740600	56.41%	7.011398	6.718531	7.011398	6.718531	7.068026	6.770494	7.464945	7.151272	7.227782	6.924904	7.227782	6.924904	9.546138	9.150908	9.546138	9.150908	9.622298	9.222558
387200	3740600	62.30%	6.801929	6.498686	6.801929	6.498686	6.853709	6.545646	7.239668	6.914994	7.011473	6.698199	7.011473	6.698199	9.263733	8.853754	9.263733	8.853754	9.335964	8.921423
387700	3740600	60.13%	6.610138	6.260281	6.610138	6.260281	6.656137	6.301058	7.03264	6.65824	6.813895	6.4523	6.813895	6.4523	9.004967	8.532135	9.004967	8.532135	9.073064	8.595075
388200	3740600	65.75%	6.302918	6.004403	6.302918	6.004403	6.341559	6.039209	6.702045	6.382756	6.496576	6.187198	6.496576	6.187198	8.591071	8.189007	8.591071	8.189007	8.653305	8.246976
388700	3740600	60.34%	6.07003	5.82704	6.07003	5.82704	6.102221	5.857464	6.451089	6.191778	6.256809	6.003926	6.256809	6.003926	8.276168	7.950299	8.276168	7.950299	8.333685	8.004806
389200	3740600	60.23%	5.876939	5.699151	5.876939	5.699151	5.904096	5.724825	6.242998	6.053306	6.057262	5.872745	6.057262	5.872745	8.016472	7.777114	8.016472	7.777114	8.070082	7.828533
389700	3740600	57.72%	5.743133	5.56888	5.743133	5.56888	5.76654	5.59111	6.09851	5.912906	5.918612	5.738207	5.918612	5.738207	7.83749	7.601771	7.83749	7.601771	7.888203	7.650547
380200	3741100	72.14%	10.672794	10.12796	10.67279	10.12796	10.83559	10.27963	11.41503	10.83009	11.00179	10.43919	11.00179	10.43919	14.484133	13.74853	14.48413	13.74853	14.63774	13.89272

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	2026_ALT1_CAAQS	2026_ALT1_NAAQS	2026_NP_CAAQS	2026_NP_NAAQS	2026_ALT3_CAAQS	2026_ALT3_NAAQS	2026_ALT4_CAAQS	2026_ALT4_NAAQS	2026_ALT5_CAAQS	2026_ALT5_NAAQS	2026_PP_CAAQS	2026_PP_NAAQS	2033_ALT1_CAAQS	2033_ALT1_NAAQS	2033_NP_CAAQS	2033_NP_NAAQS	2033_ALT3_CAAQS	2033_ALT3_NAAQS
380700	3741100	69.60%	10.568698	10.1915	10.5687	10.1915	10.72831	10.34402	11.30285	10.89851	10.89528	10.50644	10.89528	10.50644	14.342136	13.83112	14.34214	13.83112	14.49361	13.97648
381200	3741100	73.86%	10.525133	9.932729	10.52513	9.932729	10.68386	10.07944	11.25646	10.62036	10.85151	10.23931	10.85151	10.23931	14.280727	13.48183	14.28073	13.48183	14.4317	13.62254
381700	3741100	75.98%	10.273655	9.936093	10.27366	9.936093	10.42487	10.08169	10.98491	10.62354	10.59201	10.244	10.59201	10.244	13.942282	13.48461	13.94228	13.48461	14.08782	13.62499
382200	3741100	70.53%	9.996529	9.697513	9.996529	9.697513	10.14024	9.836551	10.68629	10.36644	10.30634	9.998226	10.30634	9.998226	13.568284	13.16232	13.56828	13.16232	13.70819	13.29785
382700	3741100	68.68%	9.733257	9.406876	9.733257	9.406876	9.86866	9.537664	10.40183	10.0529	10.03506	9.698299	10.03506	9.698299	13.213419	12.77097	13.21342	12.77097	13.34741	12.90038
383200	3741100	73.00%	9.330437	9.054565	9.330437	9.054565	9.454411	9.175315	9.967231	9.672788	9.619225	9.334664	9.619225	9.334664	12.671334	12.29675	12.67133	12.29675	12.79681	12.41869
383700	3741100	68.11%	9.02607	8.585273	9.02607	8.585273	9.141504	8.692315	9.638916	9.166209	9.305046	8.85025	9.305046	8.85025	12.250375	11.66381	12.25038	11.66381	12.3697	11.77568
384200	3741100	65.69%	8.459134	8.272725	8.459134	8.272725	8.55936	8.371227	9.028033	8.82922	8.7204	8.527578	8.7204	8.527578	11.496868	11.24462	11.49687	11.24462	11.60452	11.35
384700	3741100	66.34%	8.011962	7.644805	8.011962	7.644805	8.099995	7.725861	8.545775	8.151776	8.258306	7.878619	8.258306	7.878619	10.895777	10.40097	10.89578	10.40097	10.99411	10.49311
385200	3741100	58.28%	7.710417	7.491372	7.710417	7.491372	7.791084	7.568397	8.221474	7.986782	7.947801	7.721319	7.947801	7.721319	10.487568	10.19195	10.48757	10.19195	10.58026	10.28121
385700	3741100	64.58%	7.45832	7.225013	7.45832	7.225013	7.531893	7.294733	7.949679	7.699685	7.688016	7.446644	7.688016	7.446644	10.14732	9.832742	10.14732	9.832742	10.2348	9.916552
386200	3741100	61.57%	7.276961	6.931317	7.276961	6.931317	7.343651	6.990868	7.752949	7.381712	7.501215	7.143947	7.501215	7.143947	9.903437	9.437593	9.903437	9.437593	9.986312	9.514386
386700	3741100	54.71%	6.882696	6.540949	6.882696	6.540949	6.939256	6.59099	7.328339	6.961568	7.094354	6.740833	7.094354	6.740833	9.371905	8.911564	9.371905	8.911564	9.446986	8.980854
387200	3741100	58.00%	6.635609	6.36967	6.635609	6.36967	6.685927	6.415717	7.062285	6.777445	6.839269	6.564302	6.839269	6.564302	9.038965	8.679912	9.038965	8.679912	9.109203	8.746056
387700	3741100	61.54%	6.510603	6.17931	6.510603	6.17931	6.556743	6.22115	6.927147	6.572908	6.71074	6.367896	6.71074	6.367896	8.870037	8.422776	8.870037	8.422776	8.937412	8.485493
388200	3741100	61.18%	6.351353	5.990439	6.351353	5.990439	6.392355	6.026129	6.755019	6.368664	6.546717	6.173157	6.546717	6.173157	8.655341	8.168649	8.655341	8.168649	8.719115	8.227024
388700	3741100	64.52%	6.070642	5.780536	6.070642	5.780536	6.10531	5.811299	6.453253	6.142729	6.256895	5.955933	6.256895	5.955933	8.276619	7.88668	8.276619	7.88668	8.33525	7.941013
389200	3741100	59.47%	5.842852	5.62702	5.842852	5.62702	5.871531	5.654333	6.207938	5.977737	6.02217	5.797479	6.02217	5.797479	7.968909	7.679433	7.968909	7.679433	8.023033	7.730983
389700	3741100	58.44%	5.66175	5.478209	5.66175	5.478209	5.686244	5.501367	6.012974	5.817265	5.834467	5.643961	5.834467	5.643961	7.726133	7.47889	7.726133	7.47889	7.776762	7.527356
380200	3741600	73.52%	9.991862	9.728823	9.991862	9.728823	10.13892	9.87247	10.68258	10.40157	10.29816	10.02669	10.29816	10.02669	13.566932	13.21024	13.56693	13.21024	13.70775	13.34754
380700	3741600	71.37%	10.064574	9.613056	10.06457	9.613056	10.21318	9.752743	10.76098	10.27647	10.37419	9.908021	10.37419	9.908021	13.663058	13.05315	13.66306	13.05315	13.80538	13.18778
381200	3741600	74.55%	9.75034	9.258464	9.75034	9.258464	9.892934	9.39127	10.42419	9.896091	10.05067	9.542119	10.05067	9.542119	13.236519	12.5736	13.23652	12.5736	13.37384	12.70237
381700	3741600	77.31%	9.630163	9.345727	9.630163	9.345727	9.76735	9.478592	10.29318	9.988909	9.926632	9.633213	9.926632	9.633213	13.076011	12.69043	13.07601	12.69043	13.20975	12.82005
382200	3741600	70.00%	9.506784	9.220012	9.506784	9.220012	9.640109	9.348763	10.16003	9.853179	9.799934	9.504336	9.799934	9.504336	12.908818	12.51973	12.90882	12.51973	13.0399	12.64659
382700	3741600	68.80%	9.183267	8.892765	9.183267	8.892765	9.306912	9.013149	9.810808	9.50065	9.466478	9.166183	9.466478	9.166183	12.472653	12.07944	12.47265	12.07944	12.59675	12.19976
383200	3741600	74.43%	8.842302	8.655581	8.842302	8.655581	8.956712	8.768408	9.443264	9.244467	9.11457	8.922247	9.11457	8.922247	12.013345	11.75881	12.01335	11.75881	12.13047	11.8739
383700	3741600	70.69%	8.583639	8.152887	8.583639	8.152887	8.690856	8.251898	9.16434	8.702247	8.84774	8.402766	8.84774	8.402766	11.659406	11.08321	11.65522	11.08321	11.77653	11.18778
384200	3741600	63.31%	8.220053	7.94823	8.220053	7.94823	8.317138	8.04123	8.772434	8.481403	8.473195	8.191835	8.473195	8.191835	11.173663	10.80721	11.17366	10.80721	11.27797	10.90741
384700	3741600	66.92%	7.743133	7.39182	7.743133	7.39182	7.827546	7.469177	8.25833	7.881039	7.980392	7.616946	7.980392	7.616946	10.532387	10.05943	10.53239	10.05943	10.62693	10.14784
385200	3741600	60.51%	7.538214	7.173045	7.538214	7.173045	7.616887	7.244289	8.037496	7.645287	7.769484	7.39185	7.769484	7.39185	10.255177	9.763379	10.25518	9.763379	10.34555	9.847345
385700	3741600	63.81%	7.283553	7.025629	7.283553	7.025629	7.355373	7.093315	7.763166	7.486813	7.507179	7.240192	7.507179	7.240192	9.91104	9.563526	9.91104	9.563526	9.996318	9.644771
386200	3741600	64.11%	6.952114	6.740977	6.952114	6.740977	7.015568	6.800776	7.406352	7.180085	7.165248	6.947115	7.165248	6.947115	9.463884	9.178636	9.463884	9.178636	9.54272	9.254119
386700	3741600	62.01%	6.776433	6.401548	6.776433	6.401548	6.834185	6.451683	7.216389	6.813832	6.984107	6.596675	6.984107	6.596675	9.22744	8.721965	9.22744	8.721965	9.302242	8.790244
387200	3741600	55.16%	6.449977	6.215528	6.449977	6.215528	6.498177	6.260511	6.863998	6.613229	6.647191	6.404669	6.647191	6.404669	8.788114	8.471503	8.788114	8.471503	8.855894	8.535907
387700	3741600	60.22%	6.375633	6.054776	6.375633	6.054776	6.420675	6.095823	6.78326	6.440254	6.571042	6.238817	6.571042	6.238817	8.687462	8.254591	8.687462	8.254591	8.753265	8.315935
388200	3741600	59.88%	6.23875	5.915062	6.23875	5.915062	6.280045	5.952782	6.635757	6.290085	6.43003	6.09505	6.43003	6.09505	8.502514	8.065198	8.502514	8.065198	8.565547	8.123983
388700	3741600	60.44%	6.036883	5.691196	6.036883	5.691196	6.073773	5.722822	6.418883	6.04865	6.221707	5.863685	6.221707	5.863685	8.229912	7.764298	8.229912	7.764298	8.289341	7.818425
389200	3741600	64.00%	5.825201	5.539573	5.825201	5.539573	5.856249	5.566927	6.190751	5.885089	6.003647	5.707186	6.003647	5.707186	7.94397	7.560253	7.94397	7.560253	7.999085	7.611185
389700	3741600	58.11%	5.606445	5.459431	5.606445	5.459431	5.632109	5.484042	5.955144	5.798473	5.777327	5.624996	5.777327	5.624996	7.65011	7.451491	7.65011	7.451491	7.700907	7.500621
380200	3742100	71.58%	9.516303	9.29759	9.516303	9.29759	9.653142	9.43138	10.1715	9.937835	9.806486	9.581244	9.806486	9.581244	12.926498	12.62908	12.9265	12.62908	13.05874	12.75837
380700	3742100	75.23%	9.468007	9.03344	9.468007	9.03344	9.60461	9.160885	10.12043	9.653645	9.757494	9.308644	9.757494	9.308644	12.859003	12.27267	12.859	12.27267	12.99094	12.39695
381200	3742100	72.14%	9.311872	8.892563	9.311872	8.892563	9.44407	9.016512	9.952219	9.502165	9.597068	9.16375	9.597068	9.16375	12.647269	12.08169	12.64727	12.08169	12.77608	12.20333
381700	3742100	78.36%	9.07583	8.840119	9.07583	8.840119	9.201636	8.96247	9.697804	9.445778	9.353515	9.110537	9.353515	9.110537	12.329126	12.00918	12.32913	12.00918	12.45311	12.12985
382200	3742100	69.22%	9.04845	8.705589	9.04845	8.705589	9.17224	8.823671	9.667705	9.300502	9.326197	8.972196	9.326197	8.972196	12.29106	11.82726	12.29106	11.82726	12.41404	11.94497
382700	3742100	68.84%	8.680027	8.417495	8.680027	8.417495	8.793208	8.528237	9.270179	8.990175	8.946097	8.674561	8.946097	8.674561	11.794881	11.43953	11.79488	11.43953	11.91004	11.55151
383200	3742100	74.97%	8.478034	8.208081	8.478034	8.208081	8.585881	8.311928	9.052617	8.763966	8.737922	8.45961	8.737922	8.45961	11.522126	11.15568	11.52213	11.15568	11.63327	11.26301
383700	3742100	72.42%	8.210734	7.939329	8.210734	7.939329	8.310886	8.035862	8.764236	8.474179	8.462237	8.182057	8.462237	8.182057	11.161899	10.79411	11.1619	10.79411	11.2674	10.89587
384200	3742100	62.44%	7.88251	7.680941	7.88251	7.680941	7.973566	7.771791	8.416798	8.197285	8.124048	7.915522	8.124048	7.915522	10.718724	10.44605	10.71872	10.44605	10.8175	10.5423
384700	3742100	66.92%	7.596204	7.208729	7.596204	7.208729	7.679961	7.284722	8.102122	7.68604	7.828503	7.427762	7.828503	7.427762	10.332873	9.811012	10.33287	9.811012	10.42601	9.897392
385200	3742100	61.12%	7.227354	6.872315	7.227354	6.872315	7.301973	6.939708	7.705195	7.323903	7.448138	7.081043	7.448138	7.081043	9.834823	9.356491	9.834823	9.356491	9.920888	9.436332
385700	3742100	59.14%	7.012531	6.764936	7.012531	6.764936	7.08049	6.829297	7.473176	7.208174	7.22683	6.970587	7.22683	6.970587	9.545091	9.211135	9.545091	9.211135	9.62642	9.288795
386200	3742100	65.69%	6.759755	6.597182	6.759755	6.597182	6.821379	6.65638	7.20113	7.027252	6.966214	6.798512	6.966214	6.798512	9.203707	8.983298	9.203707	8.983298	9.280165	9.057422
386700	3742100	62.59%	6.601791	6.406632	6.601791	6.406632	6.657635	6.45925	7.029831	6.820883	6.803189	6.60184	6.803189	6.60184	8.99187	8.727507	8.99187	8.727507	9.064349	8.797032
387200	3742100	58.31%	6.417235	6.045278	6.417235	6.045278	6.467398	6.088211	6.830584	6.431363	6.613259	6.228702	6.613259	6.228702	8.742529	8.241096	8.742529	8.241096	8.811007	8.30324
387700	3742100	55.66%	6.169307	5.961824	6.169307	5.961824	6.211907	6.002935	6.562761	6.34166	6.357372	6.142423	6.357372	6.142423	8.409078	8.128768	8.409078	8.128768	8.47207	8.18938
388200	3742100	62.14%	6.101351	5.81336	6.101351	5.81336	6.141663	5.850486	6.489298	6.181797	6.287531	5.989679	6.287531	5.989679	8.317215	7.927738	8.317215	7.927738	8.378648	7.985425
388700	3742100	59.21%	5.912238	5.643866	5.912238	5.643866	5.949295	5.67782	6.286642	5.999923	6.092133	5.81436	6.092133	5.81436	8.061795	7.699339	8.061795	7.699339	8.12023	7.75418
389200	3742100	61.10%	5.791556	5.432112	5.791556	5.432112	5.824816	5.460294	6.156442	5.77149	5.968368	5.595305	5.968368	5.595305	7.897833	7.415194	7.897833	7.415194	7.953694	7.465584
389700	3742100	63.56%	5.574965	5.288301	5.574965	5.288301	5.602971	5.312325	5.923336	5.616363	5.74469	5.447135	5.74469	5.447135	7.605989	7.221112	7.605989	7.221112	7.657696	7.268472
389978	3741459	62.22%	5.583548	5.417735	5.583548	5.417735	5.606592	5.439991	5.929078	5.75266	5.753593	5.581869	5.753593	5.581869	7.620734	7.396315	7.620734	7.396315	7.670055	7.443956
380022	3739531	71.37%	12.593255	12.32078	12.59326	12.32078	12.79812	12.52239	13.47934	13.1887	12.98683	12.70654	12.98683	12.70654	17.070918	16.69939	17.07092	16.69939	17.25955	16.88467
379814	3739341	72.65%	12.732925	12.24761	12.73293	12.24761	12.94167	12.44789	13.62978	13.10992	13.13032	12.62992	13.13032	12.62992	17.260443	16.60275	17.26044	16.60275	17.45183	16.78663
379142	3733893	49.94%	12.284694	11.95547	12.28469	11.95547	12.44912	12.11695	13.11778	12.7675	12.64499	12.30688	12.64499	12.30688	16.7249	16.27417	16.7249	16.27417	16.88686	16.43266
389449	3739338	62.62%	6.062555	5.867121	6.062555	5.867121	6.086303	5.890523	6.437557	6.230199	6.249483	6.047621	6.249483	6.047621	8.270433	8.004447	8.270433	8.004447	8.323804	8.056211
389215	3739462	63.14%	6.088905	5.901833	6.088905	5.901833	6.114644	5.92657	6.466771	6.267949	6.276507	6.083637	6.276507	6.083637	8.305503	8.050528	8.305503	8.050528	8.360001	8.103245
378929	3734007	52.02%	11.818433	11.51682	11.81843	11.51682	11.97166	11.66811	12.61562	12.29525	12.16195	11.85238	12.16195	11.85238	16.09983	15.68601	16.09983	15.68601	16.25261	15.83597
389539	3741329	58.29%	5.67758	5.523932	5.67758	5.523932	5.703661	5.548919	6.030848	5.867084	5.850931	5.691599	5.850931	5.691599	7.746445	7.539181	7.746445	7.539181	7.798001	7.588946
390167	3738394	65.90%	6.196067	6.017456	6.196067	6.017456	6.213711	6.036422	6.574922	6.386687	6.387377	6.203433	6.387377	6.203433	8.456176	8.210897	8.456176	8.210897	8.507512	8.26168
390353	3741373	61.44%	5.577536	5.41328	5.577536	5.41328	5.596767	5.432767	5.920115	5.746003	5.747393	5.57706	5.747393	5.57706	7.614907	7.392437	7.614907	7.392437	7.662309	7.438631
383100	3738224	70.29%	12.57998	11.96624	12.57998	11.96624	12.77489	12.14821	13.4613	12.80193	12.98201	12.34778	12.98201	12.34778	17.04009	16.21284	17.04009	16.21284	17.22542	16.38723
387369	3742073	54.95%	6.306024	6.04373	6.306024	6.04373	6.352904	6.086593	6.710475	6.429678	6.498309	6.227086	6.498309	6.227086	8.59324	8.239096	8.59324	8.239096	8.659275	8.301179
387922	3743131	56.16%	5.946443	5.602592	5.946443	5.602592	5.988052	5.63863	6.325773	5.957265	6.126774	5.770613	6.126774	5.770613	8.106993	7.644175	8.106993	7.644175	8.167794	7.699536
387401	3740832	62.02%	6.691995	6.358738	6.691995	6.358738	6.741291	6.403397	7.121568	6.765059	6.898251	6.553441	6.898251	6.553441	9.114845	8.665007	9.114845	8.665007	9.185123	8.730467
387445	3739252	57.34%	6.779508	6.542903	6.779508	6.542903	6.82135	6.583508	7.209687	6.958017	6.990017	6.745399	6.990017	6.745399	9.235819	8.914749	9.235819	8.914749	9.303329	8.979895
389789	3736894	54.01%	6.52204	6.243565	6.52204	6.243565	6.541599	6.265109	6.92256	6.62856	6.726898	6.438576	6.726898	6.438576	8.89302	8.513858	8.89302	8.513858	8.948209	8.567873
387455	3740696	60.76%	6.720767	6.347368	6.720767	6.347368	6.769833	6.391336	7.151981	6.752534	6.928237	6.541734	6.928237	6.541734	9.153614	8.649901	9.153614	8.649901	9.224037	8.714929
386939	3743260	64.13%	6.162902	5.994087	6.162902	5.994087	6.213492	6.042034	6.560923	6.380265	6.349206	6.175021	6.349206	6.175021	8.398702	8.169988	8.398702	8.169988	8.465275	8.234072
390450	3740328	62.32%	5.660634	5.423052	5.660634	5.423052	5.68026	5.441441	6.008552	5.75544	5.83355	5.5866	5.83355	5.5866	7.727201	7.40759	7.727201	7.40759	7.775449	7.453219
380445	3733657	49.59%	18.078876	17.33275	18.07888	17.33275	18.38412	17.62519	19.36008	18.5607	18.64874	17.87849	18.64874	17.87849	24.48964	23.48039	24.48964	23.48039	24.76692	23.74599
389709	3742434	68.11%	5.66502	5.327165	5.66502	5.327165	5.694293	5.351678	6.019773	5.657972	5.838165	5.487506	5.838165	5.487506	7.726948	7.273251	7.726948	7.273251	7.780022	7.321186
389709	3742485	69.24%	5.680201	5.335191	5.680201	5.335191	5.709605	5.35982	6.035969	5.666551	5.853874	5.495819	5.853874	5.495819	7.747458	7.284091	7.747458	7.284091	7.800708	7.332147
389401	3740862	59.44%	5.78422	5.627829	5.78422	5.627829	5.810409	5.652403	6.144029	5.977008	5.961354	5.799214	5.961354	5.799214	7.891115	7.680335	7.891115	7.680335	7.943539	7.730716
381762	3737740	79.50%	16.786774	16.18817	16.78677	16.18817	17.09052	16.48053	17.99461	17.35262	17.33039	16.71261	17.33039	16.71261	22.69587	21.88658	22.69587	21.88658	22.96613	22.14686
380296	3733115	61.89%	16.724092	16.13896	16.72409	16.13896	16.99208	16.39621	17.89684	17.26954	17.24276	16.63876	17.24276	16.63876	22.68163	21.89024	22.68163	21.89024	22.92924	22.12849
381348	3733563	53.08%	24.953771	24.01398	24.95377	24.01398	25.43448	24.47603	26.77223	25.76339	25.77249	24.80119	25.77249	24.80119	33.69694	32.42961	33.69694	32.42961	34.11504	32.83158
389119	3738782	64.98%	6.4383	6.27452	6.4383	6.2781	6.463211	6.299078	6.845863	6.66749	6.638263	6.469099	6.638263	6.469099	8.780137	8.554532	8.780137	8.554532	8.836953	8.610426
387192	3740865	60.75%	6.703369	6.449696	6.703369	6.449696	6.754231	6.496732	7.1345	6.863008	6.909366	6.647241	6.909366	6.647241	9.130728	8.787742	9.130728	8.787742	9.201731	8.855005

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	*2026_ALT1_C AAQS*	*2026_ALT1_ NAAQS*	*2026_NP_C AAQS*	*2026_NP_N AAQS*	*2026_ALT3_ CAAQS*	*2026_ALT3_ NAAQS*	*2026_ALT4_ CAAQS*	*2026_ALT4_ NAAQS*	*2026_ALT5_ CAAQS*	*2026_ALT5_ NAAQS*	*2026_PP_CA AQS*	*2026_PP_N AAQS*	*2033_ALT1_C AAQS*	*2033_ALT1_ NAAQS*	*2033_NP_C AAQS*	*2033_NP_N AAQS*	*2033_ALT3_ CAAQS*	*2033_ALT3_ NAAQS*
389648	3738051	65.27%	6.500184	6.237591	6.500184	6.237591	6.520537	6.258122	6.89955	6.620977	6.703078	6.430546	6.703078	6.430546	8.865393	8.510344	8.865393	8.510344	8.920581	8.563456
389498	3740798	58.99%	5.753265	5.585127	5.753265	5.585127	5.778568	5.609181	6.110578	5.931304	5.929218	5.754769	5.929218	5.754769	7.84985	7.623249	7.84985	7.623249	7.901582	7.672994
389398	3742733	61.72%	5.743524	5.384378	5.743524	5.384378	5.775838	5.412423	6.104799	5.720774	5.918498	5.545913	5.918498	5.545913	7.833573	7.350437	7.833573	7.350437	7.888566	7.400393
378579	3732386	56.05%	8.979351	8.708506	8.979351	8.708506	9.058064	8.787146	9.551892	9.265882	9.215623	8.939464	9.215623	8.939464	12.30834	11.93183	12.30834	11.93183	12.40099	12.02316
387231	3740475	61.32%	6.851174	6.495284	6.851174	6.495284	6.903008	6.541654	7.292017	6.911009	7.062728	6.694763	7.062728	6.694763	9.32995	8.849345	9.32995	8.849345	9.402645	8.916683
378821	3734136	53.61%	11.507046	11.16827	11.50705	11.16827	11.65375	11.31196	12.28103	11.92057	11.83984	11.49199	11.83984	11.49199	15.68077	15.21681	15.68077	15.21681	15.82792	15.36038
390456	3738401	63.46%	6.122016	5.903514	6.122016	5.903514	6.138136	5.921411	6.495454	6.265245	6.31105	6.085863	6.31105	6.085863	8.355909	8.056046	8.355909	8.056046	8.405975	8.105505
389285	3742656	59.27%	5.754815	5.440334	5.754815	5.440334	5.787754	5.469492	6.117143	5.780939	5.929974	5.604044	5.929974	5.604044	7.84896	7.425221	7.84896	7.425221	7.904315	7.476215
390278	3738221	61.65%	6.200423	6.009779	6.200423	6.009779	6.217167	6.028285	6.578937	6.378369	6.391938	6.195939	6.391938	6.195939	8.462574	8.199738	8.462574	8.199738	8.513499	8.25033
387154	3741415	55.97%	6.514296	6.303681	6.514296	6.303681	6.563127	6.34983	6.932618	6.707495	6.71373	6.495857	6.71373	6.495857	8.875135	8.590592	8.875135	8.590592	8.94371	8.656233
387349	3740831	62.34%	6.69001	6.372219	6.69001	6.372219	6.739566	6.417397	7.119592	6.779642	6.89603	6.56724	6.89603	6.56724	9.112324	8.683305	9.112324	8.683305	9.182677	8.749106
390005	3740389	58.22%	5.786288	5.53354	5.786288	5.53354	5.808012	5.553313	6.143237	5.873737	5.963656	5.701535	5.963656	5.701535	7.896384	7.555539	7.896384	7.555539	7.946643	7.602802
388555	3741719	57.36%	6.008373	5.718768	6.008373	5.718768	6.046573	5.753207	6.389335	6.079686	6.191573	5.89185	6.191573	5.89185	8.191724	7.800807	8.191724	7.800807	8.251445	7.856463
389478	3741347	58.33%	5.699275	5.535876	5.699275	5.535876	5.726096	5.561574	6.054353	5.880177	5.87332	5.703781	5.87332	5.703781	7.775616	7.555346	7.775616	7.555346	7.827687	7.605523
387541	3742481	55.88%	6.168884	5.852648	6.168884	5.852648	6.214346	5.892424	6.564093	6.224965	6.356394	6.029403	6.356394	6.029403	8.407905	7.981393	8.407905	7.981393	8.472178	8.040505
378848	3734004	52.39%	11.575231	11.30484	11.57523	11.30484	11.72247	11.45102	12.35356	12.06693	11.90995	11.63279	11.90995	11.63279	15.774	15.40181	15.774	15.40181	15.92182	15.5476
390388	3740918	60.36%	5.657899	5.382632	5.657899	5.382632	5.677921	5.401121	6.005936	5.712693	5.830752	5.544917	5.830752	5.544917	7.723153	7.352338	7.723153	7.352338	7.771604	7.397732
390475	3738176	58.94%	6.197628	5.898562	6.197628	5.898562	6.213207	5.916302	6.575427	6.259613	6.389778	6.079889	6.389778	6.079889	8.457945	8.051234	8.457945	8.051234	8.508415	8.100417
381635	3738433	72.96%	15.14745	14.57306	15.14745	14.57306	15.41144	14.82565	16.22902	15.61292	15.63355	15.04123	15.63355	15.04123	20.495391	19.71775	20.49539	19.71775	20.73336	19.94617
380863	3732991	63.34%	19.374678	18.43988	19.37468	18.43988	19.70883	18.75354	20.75417	19.7494	19.99129	19.025	19.99129	19.025	26.22815	24.96922	26.22815	24.96922	26.52977	25.25387
378541	3733938	52.82%	10.457104	10.21301	10.4571	10.21301	10.57761	10.33359	11.14941	10.89152	10.7518	10.50217	10.7518	10.50217	14.27451	13.93658	14.27451	13.93658	14.40041	14.06122
379271	3732975	53.82%	12.37385	11.85708	12.37385	11.85708	12.53419	12.00937	13.20828	12.65576	12.73304	12.20123	12.73304	12.20123	16.85756	16.15438	16.85756	16.15438	17.01733	16.3068
379853	3731187	65.31%	11.627721	11.33825	11.62772	11.33825	11.75825	11.46858	12.39458	12.08881	11.95348	11.65826	11.95348	11.65826	15.87861	15.47639	15.87861	15.47639	16.01659	15.6129
384770	3739365	65.85%	9.020965	8.657525	9.020965	8.657525	9.125244	8.755887	9.62685	9.237627	9.302715	8.92727	9.302715	8.92727	12.255423	11.76417	12.25542	11.76417	12.36955	11.87271
389448	3738624	63.30%	6.422677	6.199413	6.422677	6.199413	6.44553	6.222889	6.818985	6.582555	6.622608	6.391269	6.622608	6.391269	8.747003	8.454013	8.747003	8.454013	8.802581	8.508291
383095	3739869	73.47%	10.713698	10.22919	10.7137	10.22919	10.86648	10.37505	11.45348	10.93527	11.05022	10.54973	11.05022	10.54973	14.522892	13.87719	14.52289	13.87719	14.68312	14.02055
379660	3734797	48.81%	14.998728	14.422	14.99873	14.422	15.23744	14.65122	16.04809	15.43094	15.45959	14.86573	15.45959	14.86573	20.35178	19.56829	20.35178	19.56829	20.57232	19.78026
380681	3734795	49.62%	21.843027	21.09793	21.84303	21.09793	22.25488	21.49563	23.42591	22.62699	22.55047	21.78184	22.55047	21.78184	29.521439	28.51335	29.52144	28.51335	29.88124	28.86098
386724	3740057	61.64%	7.213003	6.911242	7.213003	6.911242	7.271577	6.965277	7.680092	7.357203	7.436555	7.124888	7.436555	7.124888	9.81843	9.410165	9.81843	9.410165	9.897108	9.484413
388765	3741760	59.29%	5.996224	5.658046	5.996224	5.658046	6.032837	5.689614	6.375597	6.013473	6.179649	5.829448	6.179649	5.829448	8.174852	7.719218	8.174852	7.719218	8.233832	7.773081
383099	3740817	74.26%	9.634167	9.347644	9.634167	9.347644	9.76448	9.475316	10.29346	9.988076	9.933063	9.637343	9.933063	9.637343	13.080905	12.69173	13.08091	12.69173	13.21174	12.81922
390224	3740330	60.74%	5.725249	5.499051	5.725249	5.499051	5.74577	5.518923	6.077684	5.837075	5.900402	5.665345	5.900402	5.665345	7.814407	7.50965	7.814407	7.50965	7.863603	7.556611
380154	3733793	46.37%	16.666942	16.11567	16.66694	16.11567	16.93732	16.37805	17.83843	17.24924	17.18546	16.61777	17.18546	16.61777	22.59828	21.84909	22.59828	21.84909	22.84702	22.09025
389538	3740963	59.27%	5.719552	5.544159	5.719552	5.544159	5.744978	5.567976	6.074925	5.887699	5.894359	5.712384	5.894359	5.712384	7.803905	7.567673	7.803905	7.567673	7.855452	7.616994
388714	3737260	60.14%	6.934071	6.666412	6.934071	6.666412	6.960131	6.692172	7.363816	7.079551	7.153017	6.875279	7.153017	6.875279	9.449114	9.087371	9.449114	9.087371	9.510609	9.146536
378649	3736024	51.94%	12.086104	11.66562	12.0861	11.66562	12.25769	11.83537	12.9137	12.46776	12.44472	12.01354	12.44472	12.01354	16.439614	15.8613	16.43961	15.8613	16.60457	16.02287
389879	3739303	63.70%	6.069163	5.861868	6.069163	5.861868	6.089947	5.882803	6.442564	6.222789	6.256371	6.041628	6.256371	6.041628	8.281179	7.982714	8.281179	7.982714	8.333146	8.032862
378441	3735152	50.43%	10.245316	9.881677	10.24532	9.881677	10.3709	10.00377	10.92995	10.54292	10.5381	10.16494	10.5381	10.16494	13.972028	13.47365	13.97203	13.47365	14.09984	13.59761
388749	3737794	63.31%	6.698413	6.548603	6.698413	6.548603	6.724444	6.575209	7.113592	6.955287	6.908152	6.753658	6.908152	6.753658	9.131208	8.926206	9.131208	8.926206	9.190696	8.98495
383262	3739680	71.09%	10.793119	10.16854	10.79312	10.16854	10.94729	10.31131	11.54751	10.86893	11.13291	10.487	11.13291	10.487	14.638865	13.79691	14.63887	13.79691	14.79043	13.93809
389624	3738317	66.42%	6.445127	6.227959	6.445127	6.227959	6.465923	6.249455	6.841405	6.611538	6.645853	6.420949	6.645853	6.420949	8.790876	8.495851	8.790876	8.495851	8.845816	8.549436
382778	3739398	69.37%	11.783769	11.23273	11.78377	11.23273	11.96235	11.40171	12.60533	12.0149	12.15634	11.58748	12.15634	11.58748	15.97271	15.22741	15.97271	15.22741	16.14355	15.38954
382757	3737606	71.20%	14.622063	13.79026	14.62206	13.79026	14.86732	14.01738	15.66055	14.76641	15.09395	14.23415	15.09395	14.23415	19.784613	18.66425	19.78461	18.66425	20.0102	18.87464
382820	3738093	73.93%	13.548995	12.8115	13.549	12.8115	13.76926	13.01558	14.50572	13.71305	13.98371	13.22175	13.98371	13.22175	18.342501	17.34861	18.3425	17.34861	18.54753	17.5402
389389	3738887	66.46%	6.388453	6.13848	6.388453	6.13848	6.412024	6.162189	6.783142	6.518105	6.577428	6.327204	6.577428	6.327204	8.699813	8.371818	8.699813	8.371818	8.755476	8.425777
382180	3739100	70.83%	13.035097	12.24125	13.0351	12.24125	13.24741	12.43613	13.95457	13.1015	13.44947	12.62987	13.44947	12.62987	17.654913	16.58356	17.65491	16.58356	17.85158	16.766
379361	3740015	67.75%	11.715121	11.25586	11.71512	11.25586	11.90018	11.432	12.53428	12.04159	12.07667	11.60259	12.07667	11.60259	15.893696	15.27302	15.8937	15.27302	16.06558	15.43718
380824	3735170	47.74%	23.286528	22.62291	23.28653	22.62291	23.74215	23.06564	24.98717	24.27528	24.04711	23.36214	24.04711	23.36214	31.448265	30.55145	31.44827	30.55145	31.84129	30.93332
383174	3739290	71.19%	11.382181	10.68183	11.38218	10.68183	11.54912	10.83497	12.17214	11.4202	11.74258	11.01814	11.74258	11.01814	15.430666	14.48755	15.43067	14.48755	15.59312	14.63776
381835	3737984	77.16%	15.938556	15.47718	15.93856	15.47718	16.22156	15.75156	17.08096	16.58656	16.45267	15.97733	16.45267	15.97733	21.556945	20.93118	21.55695	20.93118	21.81041	21.17738
389535	3741054	59.12%	5.718972	5.558528	5.718972	5.558528	5.744499	5.582556	6.074381	5.903127	5.89379	5.727425	5.89379	5.727425	7.803005	7.586738	7.803005	7.586738	7.85459	7.636296
379332	3734589	44.60%	13.023478	12.54891	13.02348	12.54891	13.21223	12.73134	13.91907	13.4123	13.41393	12.92539	13.41393	12.92539	17.70389	17.0578	17.70389	17.0578	17.88426	17.23198
389714	3737893	59.82%	6.487073	6.223266	6.487073	6.223266	6.506509	6.243155	6.884948	6.60532	6.689244	6.415628	6.689244	6.415628	8.848764	8.491498	8.848764	8.491498	8.90334	8.544155
379760	3736916	53.67%	16.23212	15.5307	16.23212	15.5307	16.51477	15.80117	17.38842	16.63746	16.74428	16.02213	16.74428	16.02213	21.981499	21.02864	21.9815	21.02864	22.23477	21.2712
389686	3741436	58.31%	5.612504	5.464328	5.612504	5.464328	5.637577	5.488369	5.961159	5.803248	5.78358	5.629961	5.78358	5.629961	7.658753	7.458761	7.658753	7.458761	7.709286	7.507615
387943	3742041	59.16%	6.16244	5.860067	6.16244	5.860067	6.204685	5.898545	6.555302	6.232089	6.350429	6.037487	6.350429	6.037487	8.399637	7.991413	8.399637	7.991413	8.462427	8.050022
387255	3739936	60.47%	6.916905	6.487345	6.916905	6.487345	6.96685	6.531343	7.360608	6.90111	7.131319	6.686943	7.131319	6.686943	9.419225	8.839214	9.419225	8.839214	9.491608	8.90541
389235	3740749	59.99%	5.850448	5.663467	5.850448	5.663467	5.877641	5.689036	6.214942	6.015341	6.029876	5.835676	6.029876	5.835676	7.980437	7.729009	7.980437	7.729009	8.033871	7.780069
379517	3732375	64.42%	12.2498	11.9772	12.2498	11.9772	12.40449	12.13014	13.07235	12.78309	12.60282	12.32397	12.60282	12.32397	16.69654	16.32047	16.69654	16.32047	16.85225	16.47383
380014	3733758	47.68%	15.816858	15.39634	15.81686	15.39634	16.06562	15.64014	16.92195	16.4735	16.30465	15.8722	16.30465	15.8722	21.46008	20.88624	21.46008	20.88624	21.69147	21.11245
379495	3737075	52.77%	15.061462	14.29864	15.06146	14.29864	15.3126	14.53777	16.12504	15.30928	15.53104	14.74589	15.53104	14.74589	20.415173	19.37761	20.41517	19.37761	20.64359	19.59508
380299	3740161	74.21%	11.80614	11.33247	11.80614	11.33247	11.99391	11.51117	12.63357	12.1255	12.17388	11.68489	12.17388	11.68489	16.009288	15.34363	16.00929	15.34363	16.1837	15.50981
380257	3740403	73.17%	11.521725	11.02523	11.52173	11.02523	11.7031	11.19686	12.32767	11.79499	11.87968	11.36727	11.87968	11.36727	15.626649	14.82289	15.62665	14.82289	15.7958	14.98171
389875	3741853	58.82%	5.661032	5.485302	5.661032	5.485302	5.686583	5.50933	6.012943	5.825572	5.833797	5.65195	5.833797	5.65195	7.72436	7.486616	7.72436	7.486616	7.775514	7.535692
381988	3739995	73.99%	11.620969	11.03104	11.62097	11.03104	11.80183	11.20005	12.43372	11.80062	11.98617	11.37737	11.98617	11.37737	15.75376	14.95641	15.75376	14.95641	15.92416	15.11675
379279	3735517	42.85%	13.921498	13.33348	13.9215	13.33348	14.13619	13.54045	14.88968	14.26201	14.34564	13.74074	14.34564	13.74074	18.902061	18.10084	18.90206	18.10084	19.10267	18.29379
383239	3739989	73.20%	10.381346	9.919552	10.38135	9.919552	10.52676	10.05788	11.09604	10.60186	10.70629	10.22947	10.70629	10.22947	14.074376	13.46066	14.07438	13.46066	14.21857	13.5979
390353	3739073	61.04%	5.99116	5.782502	5.99116	5.782502	6.009416	5.801233	6.358041	6.13708	6.1753	5.959312	6.1753	5.959312	8.17751	7.893977	8.17751	7.893977	8.227581	7.942666
381187	3734118	42.83%	25.247453	24.63299	25.24745	24.63299	25.74351	25.11768	27.09454	26.43565	26.07788	25.44327	26.07788	25.44327	34.083048	33.25299	34.08305	33.25299	34.51126	33.67116
380461	3731193	67.15%	14.170764	13.93096	14.17076	13.93096	14.36282	14.12331	15.13428	14.88157	14.58933	14.3455	14.58933	14.3455	19.28511	18.95016	19.28511	18.95016	19.47353	19.1378
380049	3733031	65.52%	15.499766	15.14983	15.49977	15.14983	15.7359	15.38191	16.57617	16.20283	15.9734	15.61284	15.9734	15.61284	21.04374	20.56792	21.04374	20.56792	21.26582	20.78558
389106	3738800	63.80%	6.420498	6.258902	6.420498	6.258902	6.445413	6.284357	6.825952	6.647255	6.619828	6.453466	6.619828	6.453466	8.755961	8.53437	8.755961	8.53437	8.812636	8.590239
387111	3740236	59.79%	6.947367	6.586688	6.947367	6.586688	7.000625	6.633938	7.394893	7.008571	7.161963	6.789449	7.161963	6.789449	9.460349	8.972719	9.460349	8.972719	9.534438	9.041213
389796	3738044	64.05%	6.429867	6.172614	6.429867	6.172614	6.449158	6.192375	6.82414	6.551479	6.629898	6.363092	6.629898	6.363092	8.771461	8.423026	8.771461	8.423026	8.825499	8.475227
379594	3738367	58.36%	13.865361	13.43434	13.86536	13.43434	14.09363	13.65909	14.84226	14.38393	14.2968	13.85454	14.2968	13.85454	18.797826	18.20645	18.79783	18.20645	19.00646	18.4107
390160	3739058	63.17%	6.09738	5.872762	6.09738	5.872762	6.116693	5.892297	6.471548	6.233376	6.285726	6.052875	6.285726	6.052875	8.309826	8.015772	8.320106	8.015772	8.371589	8.06557
382425	3738317	70.11%	14.172769	13.50765	14.17277	13.50765	14.41029	13.73136	15.17834	14.46416	14.62749	13.94079	14.62749	13.94079	19.182735	18.28453	19.18274	18.28453	19.40069	18.49088
379699	3732970	58.51%	13.771185	13.52686	13.77119	13.52686	13.96453	13.71946	14.71324	14.45429	14.18166	13.93089	14.18166	13.93089	18.72916	18.39316	18.72916	18.39316	18.91643	18.57858
379666	3731426	73.80%	11.540601	11.312	11.5406	11.312	11.67021	11.44316	12.30162	12.06179	11.86349	11.63191	11.86349	11.63191	16.76055	15.43858	16.76055	15.43858	15.89737	15.57532
379935	3736833	54.23%	16.836785	16.12368	16.83679	16.12368	17.13525	16.40939	18.04076	17.27686	17.37158	16.63675	17.37158	16.63675	22.789659	21.82244	22.78966	21.82244	23.0556	22.07725
387156	3740295	59.85%	6.917186	6.559308	6.917186	6.559308	6.969874	6.606138	7.362552	6.979272	7.130887	6.761205	7.130887	6.761205	9.41937	8.935611	9.41937	8.935611	9.492979	9.003714
390248	3737371	57.20%	6.484598	6.119505	6.484598	6.119505	6.501312	6.137701	6.880682	6.494075	6.687352	6.308044	6.687352	6.308044	8.845651	8.352064	8.845651	8.352064	8.898991	8.403073
390538	3737763	61.06%	6.271372	5.937669	6.271372	5.937669	6.286782	5.954586	6.653475	6.300246	6.466	6.119421	6.466	6.119421	8.558366	8.10686	8.558366	8.10686	8.609309	8.155741
387420	3740551	59.79%	6.765542	6.374382	6.765542	6.374382	6.814883	6.418227	7.199673	6.781121	6.974596	6.569752	6.974596	6.569752	9.214182	8.686475	9.214182	8.686475	9.285098	8.751676
379821	3736524	51.42%	16.672305	15.8302	16.67231	15.8302	16.96259	16.10574	17.86002	16.95811	17.19897	16.33089	17.19897	16.33089	22.576504	21.43468	22.5765	21.43468	22.83664	21.68177
389624	3738615	62.35%	6.360041	6.163367	6.360041	6.163367	6.381523	6.185757	6.751515	6.543582	6.557416	6.353916	6.557416	6.353916	8.675701	8.398262	8.675701	8.407982	8.730248	8.461475
378750	3733896	52.23%	11.108779	10.85128	11.10878	10.85128	11.24458	10.98631	11.85094	11.5782	11.42652	11.1628	11.42652	11.1628	15.14926	14.79412	15.14926	14.79412	15.28769	14.93088

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	*2026_ALT1_CAAQS*	*2026_ALT1_NAAQS*	*2026_NP_CAAQS*	*2026_NP_NAAQS*	*2026_ALT3_CAAQS*	*2026_ALT3_NAAQS*	*2026_ALT4_CAAQS*	*2026_ALT4_NAAQS*	*2026_ALT5_CAAQS*	*2026_ALT5_NAAQS*	*2026_PP_CAAQS*	*2026_PP_NAAQS*	*2033_ALT1_CAAQS*	*2033_ALT1_NAAQS*	*2033_NP_CAAQS*	*2033_NP_NAAQS*	*2033_ALT3_CAAQS*	*2033_ALT3_NAAQS*
390276	3738162	59.71%	6.222247	6.024754	6.222247	6.024754	6.238833	6.043341	6.602029	6.394327	6.414679	6.21152	6.414679	6.21152	8.491923	8.219876	8.491923	8.219876	8.542977	8.270648
380498	3740249	71.71%	11.734444	11.35337	11.73444	11.35337	11.92104	11.53324	12.55687	12.1487	12.10009	11.70735	12.10009	11.70735	15.911746	15.39501	15.91175	15.39501	16.0851	15.56247
378867	3731455	67.16%	10.070878	9.885933	10.07088	9.885933	10.16145	9.979031	10.71535	10.52225	10.33844	10.15135	10.33844	10.15135	13.79769	13.53578	13.79769	13.53578	13.90323	13.64198
378709	3734317	47.39%	11.134997	10.84495	11.135	10.84495	11.27418	10.98216	11.88148	11.57352	11.4551	11.15802	11.4551	11.15802	15.17961	14.78037	15.17961	14.78037	15.32022	14.91852
379694	3736911	53.48%	15.879982	15.25473	15.87998	15.25473	16.15324	15.51805	17.00836	16.3398	16.37928	15.73612	16.37928	15.73612	21.510571	20.65949	21.51057	20.65949	21.75637	20.89632
387129	3741587	54.88%	6.498683	6.246953	6.498683	6.246953	6.54819	6.292461	6.916517	6.646927	6.697521	6.437272	6.697521	6.437272	8.853629	8.513691	8.853629	8.513691	8.922403	8.578616
382074	3740337	71.02%	11.104524	10.59122	11.10452	10.59122	11.27293	10.74996	11.87771	11.32727	11.45203	10.92231	11.45203	10.92231	15.059479	14.36532	15.05948	14.36532	15.21989	14.51733
384631	3739119	64.48%	9.276391	8.934975	9.276391	8.934975	9.386557	9.039055	9.901613	9.535747	9.566757	9.21445	9.566757	9.21445	12.599238	12.13726	12.59924	12.13726	12.71817	12.25076
387444	3742469	57.38%	6.236336	5.879331	6.236336	5.879331	6.283402	5.919894	6.636717	6.25377	6.426241	6.056903	6.426241	6.056903	8.498413	8.017359	8.498413	8.017359	8.564007	8.077052
386969	3740593	60.13%	6.881993	6.605929	6.881993	6.605929	6.93571	6.655436	7.32585	7.030336	7.094219	6.808828	7.094219	6.808828	9.371507	8.99855	9.371507	8.99855	9.44529	9.068221
390180	3738228	63.46%	6.212093	6.027927	6.212093	6.027927	6.229428	6.046625	6.591632	6.397636	6.403729	6.214357	6.403729	6.214357	8.478655	8.225096	8.478655	8.225096	8.529911	8.275852
384377	3739369	61.76%	9.370515	9.051859	9.370515	9.051859	9.483665	9.160946	10.00338	9.662868	9.663945	9.334694	9.663945	9.334694	12.725648	12.29437	12.72565	12.29437	12.84673	12.41109
387724	3740376	60.93%	6.608084	6.245923	6.608084	6.245923	6.652527	6.285117	7.029522	6.641944	6.812134	6.437457	6.812134	6.437457	9.002392	8.513598	9.002392	8.513598	9.069771	8.575646
390207	3737910	60.67%	6.339662	6.091802	6.339662	6.091802	6.356581	6.110066	6.726903	6.465188	6.536636	6.280814	6.536636	6.280814	8.650237	8.311365	8.650237	8.311365	8.702437	8.362455
390631	3737633	59.67%	6.201106	5.944846	6.201106	5.944846	6.216022	5.961609	6.578399	6.307804	6.392541	6.127061	6.392541	6.127061	8.464834	8.116255	8.464834	8.116255	8.514845	8.165159
390365	3737647	59.52%	6.380266	6.021011	6.380266	6.021011	6.396394	6.038635	6.769575	6.389251	6.579158	6.206151	6.579158	6.206151	8.704813	8.218584	8.704813	8.218584	8.757035	8.268552
389921	3738609	63.36%	6.285478	6.050044	6.285478	6.050044	6.304942	6.07029	6.671172	6.421919	6.48058	6.236502	6.48058	6.236502	8.575023	8.2557	8.575023	8.2557	8.62807	8.307241
389883	3738053	62.97%	6.382234	6.160364	6.382234	6.160364	6.400946	6.179817	6.773153	6.538395	6.580323	6.350786	6.580323	6.350786	8.707669	8.405776	8.707669	8.405776	8.761007	8.457795
390052	3737368	57.48%	6.553627	6.212211	6.553627	6.212211	6.571237	6.23118	6.954523	6.593237	6.758925	6.405069	6.758925	6.405069	8.938532	8.475172	8.938532	8.475172	8.992874	8.527471
389599	3738178	67.30%	6.487863	6.267929	6.487863	6.267929	6.508734	6.289256	6.886805	6.653801	6.69024	6.462341	6.69024	6.462341	8.848544	8.550201	8.848544	8.550201	8.903867	8.604013
387995	3740853	61.10%	6.451246	6.071362	6.451246	6.071362	6.49405	6.108832	6.862167	6.455615	6.650073	6.25665	6.650073	6.25665	8.789891	8.27797	8.789891	8.27797	8.855316	8.337796
378996	3739241	61.11%	12.1191	11.71219	12.1191	11.71219	12.30859	11.89705	12.96454	12.53066	12.49106	12.07234	12.49106	12.07234	16.447481	15.89256	16.44748	15.89256	16.62387	16.06406
389600	3738360	65.75%	6.437228	6.21597	6.437228	6.21597	6.458303	6.237872	6.833169	6.599032	6.637545	6.408367	6.637545	6.408367	8.780241	8.479738	8.780241	8.479738	8.835236	8.533388
390315	3739619	63.06%	5.849977	5.661114	5.849977	5.661114	5.868855	5.679818	6.20888	6.008296	6.029658	5.833597	6.029658	5.833597	7.984416	7.711667	7.984416	7.711667	8.033792	7.75911
388103	3741683	61.72%	6.223947	5.926309	6.223947	5.926309	6.265572	5.964637	6.62021	6.30238	6.414454	6.106534	6.414454	6.106534	8.482804	8.080394	8.482804	8.080394	8.545825	8.139542
390224	3738014	59.99%	6.292646	6.078884	6.292646	6.078884	6.309421	6.097247	6.676874	6.451588	6.487747	6.267562	6.487747	6.267562	8.586957	8.293472	8.586957	8.293472	8.638688	8.344547
387926	3742882	53.52%	5.951571	5.701596	5.951571	5.701596	5.992163	5.739236	6.33054	6.063364	6.132158	5.873182	6.132158	5.873182	8.114392	7.777402	8.114392	7.777402	8.174742	7.83433
388691	3740431	57.45%	6.077306	5.842259	6.077306	5.842259	6.108678	5.871907	6.458264	6.207443	6.264378	6.019858	6.264378	6.019858	8.28648	7.971077	8.28648	7.971077	8.343647	8.025346
378469	3734936	47.55%	10.204329	9.875206	10.20433	9.875206	10.32764	9.995828	10.88473	10.53482	10.49502	10.15742	10.49502	10.15742	13.919221	13.46179	13.91922	13.46179	14.04556	13.5848
387340	3741495	57.15%	6.435993	6.227348	6.435993	6.227348	6.483165	6.271795	6.848448	6.625458	6.632666	6.417071	6.632666	6.417071	8.769865	8.487517	8.769865	8.487517	8.837017	8.55179
386718	3739983	60.06%	7.21984	6.911115	7.21984	6.911115	7.278707	6.965245	7.687555	7.357171	7.443673	7.12486	7.443673	7.12486	9.827458	9.409683	9.827458	9.409683	9.906336	9.484003
380186	3733726	46.74%	16.663597	16.11671	16.6636	16.11671	16.93337	16.37848	17.83455	17.24986	17.18212	16.61856	17.18212	16.61856	22.59433	21.85117	22.59433	21.85117	22.84277	22.09203
381264	3732980	58.63%	21.938742	21.31767	21.93874	21.31767	22.33898	21.70661	23.51552	22.85339	22.64939	22.00712	22.64939	22.00712	29.65913	28.77072	29.65913	28.77072	30.01392	29.1145
388011	3741615	62.29%	6.254911	5.969052	6.254911	5.969052	6.297191	6.008039	6.653416	6.348163	6.446235	6.150776	6.446235	6.150776	8.524977	8.138061	8.524977	8.138061	8.588515	8.197843
388112	3742445	57.15%	5.985878	5.778042	5.985878	5.778042	6.025345	5.815639	6.366184	6.144599	6.167736	5.952897	6.167736	5.952897	8.161577	7.879959	8.161577	7.879959	8.221647	7.937568
387172	3741938	56.89%	6.446397	6.122941	6.446397	6.122941	6.496471	6.16714	6.861443	6.514582	6.643418	6.309078	6.643418	6.309078	8.782241	8.34578	8.782241	8.34578	8.850893	8.409139
390062	3738250	64.78%	6.270013	6.075239	6.270013	6.075239	6.288088	6.094192	6.653664	6.447966	6.464033	6.263301	6.464033	6.263301	8.556051	8.28921	8.556051	8.28921	8.608185	8.340443
389026	3737038	56.95%	6.869209	6.659628	6.869209	6.659628	6.892072	6.683575	7.292863	7.071362	7.085854	6.869022	7.085854	6.869022	9.363114	9.077666	9.363114	9.077666	9.422544	9.136033
389481	3741039	59.45%	5.732312	5.575364	5.732312	5.575364	5.758158	5.599632	6.088751	5.921173	5.907609	5.744923	5.907609	5.744923	7.820874	7.609282	7.820874	7.609282	7.87272	7.65911
380158	3734275	44.52%	17.164132	16.53689	17.16413	16.53689	17.45236	16.81452	18.37816	17.70678	17.70135	17.05535	17.70135	17.05535	23.25954	22.40812	23.25954	22.40812	23.52123	22.66024
387982	3740075	61.37%	6.445539	6.205969	6.445539	6.205969	6.484494	6.242925	6.853601	6.598035	6.644486	6.396046	6.644486	6.396046	8.783903	8.460845	8.783903	8.460845	8.847439	8.521466
378816	3733895	51.97%	11.34769	11.04577	11.34769	11.04577	11.48924	11.18537	12.10824	11.7876	11.67394	11.36423	11.67394	11.36423	15.46976	15.05507	15.46976	15.05507	15.61293	15.19555
379745	3733311	52.16%	14.504578	14.12769	14.50458	14.12769	14.718	14.33668	15.5052	15.10306	14.94255	14.55447	14.94255	14.55447	19.70832	19.19507	19.70832	19.19507	19.91143	19.39353
380440	3733911	45.84%	18.224092	17.61686	18.22409	17.61686	18.53602	17.91947	19.51863	18.86924	18.79937	18.17356	18.79937	18.17356	24.68197	23.85778	24.68197	23.85778	24.96366	24.13072
387611	3742700	56.91%	6.118671	5.782419	6.118671	5.782419	6.163723	5.821358	6.51057	6.149927	6.304489	5.956706	6.304489	5.956706	8.339809	7.886599	8.339809	7.886599	8.40352	7.944748
387731	3741753	58.82%	6.314782	6.001363	6.314782	6.001363	6.359191	6.041936	6.7183	6.383301	6.508066	6.183558	6.508066	6.183558	8.605208	8.182284	8.605208	8.182284	8.670232	8.242987
388870	3737870	62.12%	6.704994	6.515853	6.704994	6.515853	6.730386	6.541812	7.120211	6.919995	6.915185	6.719364	6.915185	6.719364	9.140042	8.883016	9.140042	8.883016	9.199312	8.941094
389981	3738882	62.72%	6.202013	5.977153	6.202013	5.977153	6.221863	5.99764	6.582899	6.344759	6.394118	6.160991	6.394118	6.160991	8.461601	8.156751	8.461601	8.156751	8.514179	8.207838
388635	3741379	62.59%	6.09155	5.745139	6.09155	5.745139	6.128328	5.776635	6.476779	6.105737	6.278302	5.919411	6.278302	5.919411	8.304194	7.837876	8.304194	7.837876	8.363981	7.892332
388088	3740588	65.25%	6.375217	6.066097	6.375217	6.066097	6.415128	6.101909	6.77963	6.44896	6.571564	6.25139	6.571564	6.25139	8.688071	8.271424	8.688071	8.271424	8.751529	8.33044
387556	3739981	61.80%	6.705904	6.40029	6.705904	6.40029	6.750864	6.441351	7.133539	6.806941	6.913165	6.597299	6.913165	6.597299	9.135317	8.721866	9.135317	8.721866	9.203663	8.78604
387009	3743355	63.72%	6.128209	5.955042	6.128209	5.955042	6.177984	6.002189	6.523641	6.338351	6.31349	6.134733	6.31349	6.134733	8.351654	8.117198	8.351654	8.117198	8.417607	8.180611
387670	3740411	62.28%	6.634831	6.265713	6.634831	6.265713	6.68042	6.305632	7.05857	6.66342	6.839521	6.457908	6.839521	6.457908	9.038603	8.540042	9.038603	8.540042	9.10671	8.6026
390403	3740229	62.46%	5.694324	5.4656	5.694324	5.4656	5.714124	5.484401	6.044415	5.800852	5.868447	5.630674	5.868447	5.630674	7.772783	7.465085	7.772783	7.465085	7.821407	7.511229
382216	3739181	70.99%	12.920992	12.134	12.92099	12.134	13.13034	12.32644	13.83169	12.98624	13.33158	12.519	13.33158	12.519	17.50128	16.4392	17.50128	16.4392	17.69567	16.61959
378878	3732123	67.87%	9.788845	9.524754	9.788845	9.524754	9.883296	9.618917	10.42055	10.14155	10.05192	9.782687	10.05192	9.782687	13.4009	13.03379	13.4009	13.03379	13.50722	13.13874
389425	3742800	61.54%	5.731192	5.372679	5.731192	5.372679	5.763262	5.400626	6.091566	5.708311	5.905727	5.533798	5.905727	5.533798	7.816978	7.334624	7.816978	7.334624	7.871755	7.384435
379320	3739551	62.95%	12.035352	11.81465	12.03535	11.81465	12.22489	12.00324	12.87651	12.64233	12.40686	12.17995	12.40686	12.17995	16.328408	16.02616	16.32841	16.02616	16.50464	16.20048
380519	3733982	47.13%	18.901381	18.22695	18.90138	18.22695	19.2308	18.54531	20.24913	19.52712	19.50165	18.806	19.50165	18.806	25.58789	24.65541	25.58789	24.65541	25.88366	24.94076
378626	3738189	54.76%	11.414164	10.73081	11.41416	10.73081	11.58164	10.88996	12.2004	11.47161	11.75604	11.05379	11.75604	11.05379	15.51546	14.58213	15.51546	14.58213	15.6745	14.73284
381827	3738004	77.17%	15.881693	15.40624	15.88169	15.40624	16.16335	15.67886	17.01981	16.51015	16.39381	15.90379	16.39381	15.90379	21.48055	20.83592	21.48055	20.83592	21.73301	21.08069
388688	3740334	60.14%	6.09752	5.87937	6.09752	5.87937	6.128481	5.908738	6.479453	6.24669	6.285382	6.058508	6.285382	6.058508	8.314031	8.021114	8.314031	8.021114	8.371179	8.075585
388894	3740733	59.15%	5.991123	5.787617	5.991123	5.787617	6.021612	5.816423	6.366346	6.1491	6.175415	5.963876	6.175415	5.963876	8.169558	7.896184	8.169558	7.896184	8.22567	7.949739
388832	3740311	57.23%	6.061803	5.81555	6.061803	5.81555	6.091323	5.843721	6.440712	6.178201	6.248808	5.99247	6.248808	5.99247	8.265601	7.935187	8.265601	7.935187	8.321822	7.988582
381603	3740192	75.18%	11.668204	11.182	11.6682	11.182	11.85117	11.35683	12.48512	11.96431	12.03465	11.53249	12.03465	11.53249	15.817436	15.16005	15.81744	15.16005	15.98916	15.32426
387506	3739696	61.56%	6.75336	6.50225	6.75336	6.50225	6.797489	6.544425	7.183368	6.915838	6.962508	6.702914	6.962508	6.702914	9.199851	8.859427	9.199851	8.859427	9.268191	8.92494
390444	3739033	59.18%	5.961292	5.796722	5.961292	5.796722	5.97889	5.815169	6.325902	6.152159	6.144342	5.974699	6.144342	5.974699	8.137518	7.91203	8.137518	7.91203	8.187009	7.960812
378938	3731817	64.15%	10.099412	9.819838	10.09941	9.819838	10.19757	9.918123	10.75168	10.45682	10.37101	10.08665	10.37101	10.08665	13.82526	13.43492	13.82526	13.43492	13.93534	13.54389
390594	3738247	58.36%	6.138468	5.825042	6.138468	5.825042	6.153594	5.842429	6.512357	6.181314	6.328534	6.003449	6.328534	6.003449	8.37791	7.952374	8.37791	7.952374	8.427708	8.000742
388725	3741155	64.49%	6.043174	5.756114	6.043174	5.756114	6.077677	5.786625	6.424014	6.116679	6.228477	5.930704	6.228477	5.930704	8.239424	7.853531	8.239424	7.853531	8.297763	7.907571
380203	3736551	58.47%	17.618984	17.15891	17.61898	17.15891	17.93903	17.47264	18.8855	18.39407	18.18302	17.70954	18.18302	17.70954	23.83443	23.20787	23.83443	23.20787	24.11738	23.48469
390195	3739970	62.25%	5.825408	5.58634	5.825408	5.58634	5.845926	5.605893	6.183912	5.929452	6.004122	5.755779	6.004122	5.755779	7.950328	7.628208	7.950328	7.628208	8.000294	7.675686
388192	3740542	65.51%	6.310734	6.032827	6.310734	6.032827	6.349257	6.067854	6.710256	6.413068	6.504662	6.216684	6.504662	6.216684	8.601744	8.227289	8.601744	8.227289	8.663984	8.285612
383107	3737969	68.84%	12.896075	12.29046	12.89608	12.29046	13.09756	12.47943	13.80099	13.1505	13.30941	12.68341	13.30941	12.68341	17.464813	16.64854	17.46481	16.64854	17.65579	16.82898
389940	3740373	58.26%	5.807772	5.557145	5.807772	5.557145	5.829833	5.577196	6.166228	5.898922	5.985771	5.725854	5.985771	5.725854	7.925537	7.587639	7.925537	7.587639	7.976138	7.635202
390373	3740260	62.41%	5.698034	5.457654	5.698034	5.457654	5.717985	5.476479	6.048444	5.792441	5.872286	5.622424	5.872286	5.622424	7.777707	7.454297	7.777707	7.454297	7.826422	7.500406
390533	3740347	62.24%	5.634111	5.413237	5.634111	5.413237	5.653381	5.431396	5.980156	5.744865	5.805999	5.57641	5.805999	5.57641	7.691611	7.39449	7.691611	7.39449	7.73947	7.439914
389282	3739139	62.47%	6.158206	5.968591	6.158206	5.968591	6.182554	5.99239	6.539369	6.338189	6.348358	6.153022	6.348358	6.153022	8.400201	8.141171	8.400201	8.141171	8.454578	8.194001
378807	3734759	45.24%	11.218134	10.89361	11.21813	10.89361	11.36386	11.03653	11.97497	11.6298	11.54404	11.21103	11.54404	11.21103	15.282271	14.83731	15.28227	14.83731	15.42739	14.97909
388084	3742865	53.61%	5.87327	5.668376	5.87327	5.668376	5.911651	5.705148	6.246038	6.027609	6.05123	5.838974	6.05123	5.838974	8.009252	7.732452	8.009252	7.732452	8.067927	7.788727
388917	3737693	62.88%	6.74762	6.500706	6.74762	6.500706	6.772513	6.525766	7.165186	6.90323	6.959667	6.703375	6.959667	6.703375	9.197494	8.863701	9.197494	8.863701	9.256913	8.921156
379706	3740182	71.54%	11.513073	11.31992	11.51307	11.31992	11.69285	11.49772	12.31695	12.11108	11.8692	11.67033	11.8692	11.67033	15.619208	15.35596	15.61921	15.35596	15.78716	15.52171
388856	3738266	61.73%	6.67022	6.514402	6.67022	6.514402	6.696669	6.541497	7.083834	6.919233	6.878488	6.712915	6.878488	6.712915	9.093681	8.873838	9.093681	8.873838	9.153062	8.932375
380807	3733760	50.19%	20.273452	19.81328	20.27345	19.81328	20.63594	20.17	21.72723	21.23583	20.92379	20.44898	20.92379	20.44898	27.42606	26.80154	27.42606	26.80154	27.749	27.11846
379507	3732828	59.16%	12.968137	12.30893	12.96814	12.30893	13.14232	12.47129	13.84807	13.14189	13.34842	12.66934	13.34842	12.66934	17.65507	16.76079	17.65507	16.76079	17.82637	16.92172
390021	3738204	64.71%	6.301945	6.095452	6.301945	6.095452	6.320184	6.114426	6.687648	6.469393	6.497121	6.284106	6.497121	6.284106	8.599215	8.316887	8.599215	8.316887	8.651676	8.368258
388005	3742146	59.13%	6.108891	5.834427	6.108891	5.834427	6.150413	5.872518	6.49801	6.204687	6.294989	6.011145	6.294989	6.011145	8.327439	7.956436	8.327439	7.956436	8.389459	8.014692

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	*2026_ALT1_CAAQS*	*2026_ALT1_NAAQS*	*2026_NP_CAAQS*	*2026_NP_NAAQS*	*2026_ALT3_CAAQS*	*2026_ALT3_NAAQS*	*2026_ALT4_CAAQS*	*2026_ALT4_NAAQS*	*2026_ALT5_CAAQS*	*2026_ALT5_NAAQS*	*2026_PP_CAAQS*	*2026_PP_NAAQS*	*2033_ALT1_CAAQS*	*2033_ALT1_NAAQS*	*2033_NP_CAAQS*	*2033_NP_NAAQS*	*2033_ALT3_CAAQS*	*2033_ALT3_NAAQS*
382973	3739597	73.28%	11.160081	10.82583	11.16008	10.82583	11.32303	10.98482	11.93352	11.57683	11.51145	11.16703	11.51145	11.16703	15.134378	14.67964	15.13438	14.67964	15.29275	14.83391
379841	3740022	71.14%	11.80826	11.53227	11.80826	11.53227	11.9964	11.71597	12.6357	12.34043	12.17498	11.89058	12.17498	11.89058	16.014197	15.63964	16.0142	15.63964	16.18865	15.80998
389258	3739250	63.11%	6.129088	5.972726	6.129088	5.972726	6.154069	5.997294	6.508889	6.343138	6.318124	6.157391	6.318124	6.157391	8.360467	8.146084	8.360467	8.146084	8.414914	8.199348
388234	3742867	54.90%	5.82178	5.651318	5.82178	5.651318	5.85886	5.687287	6.190557	6.009103	5.997958	5.821732	5.997958	5.821732	7.940146	7.70892	7.940146	7.70892	7.997781	7.764749
382152	3737824	76.19%	15.907384	14.96063	15.90738	14.96063	16.1887	15.22133	17.04719	16.02975	16.4216	15.44345	16.4216	15.44345	21.513012	20.23663	21.51301	20.23663	21.76565	20.47224
378944	3734805	46.24%	11.708973	11.24002	11.70897	11.24002	11.86678	11.39173	12.50393	12.00329	12.05283	11.57012	12.05283	11.57012	15.939486	15.30095	15.93949	15.30095	16.09448	15.44984
389533	3741212	59.42%	5.679653	5.53984	5.679653	5.53984	5.705242	5.564317	6.032731	5.883645	5.853118	5.708188	5.853118	5.708188	7.749552	7.560848	7.749552	7.560848	7.800878	7.610511
388859	3742514	60.12%	5.798975	5.538171	5.798975	5.538171	5.834404	5.570715	6.165432	5.886955	5.974937	5.705186	5.974937	5.705186	7.908912	7.556207	7.908912	7.556207	7.965692	7.609593
389020	3739872	57.07%	6.100378	5.905224	6.100378	5.905224	6.128231	5.931361	6.480433	6.272397	6.288554	6.086841	6.288554	6.086841	8.319376	8.054926	8.319376	8.054926	8.375047	8.108311
389472	3740264	59.68%	5.873891	5.659474	5.873891	5.659474	5.899008	5.68248	6.238377	6.009527	6.054081	5.832053	6.054081	5.832053	8.013718	7.724089	8.013718	7.724089	8.066289	7.773959
379181	3735610	45.05%	13.604367	13.02171	13.60437	13.02171	13.81171	13.2216	14.54837	13.92655	14.01726	13.41787	14.01726	13.41787	18.476445	17.68206	18.47645	17.68206	18.67087	17.86916
387188	3740575	62.24%	6.816111	6.516403	6.816111	6.516403	6.868115	6.56371	7.254843	6.934005	7.026133	6.716495	7.026133	6.716495	9.282863	8.877655	9.282863	8.877655	9.355323	8.945606
389579	3738221	67.15%	6.479022	6.268832	6.479022	6.268832	6.499995	6.29055	6.877481	6.655018	6.68099	6.46323	6.68099	6.46323	8.836676	8.551269	8.836676	8.551269	8.891958	8.60527
379407	3739022	61.65%	12.790607	12.51084	12.79061	12.51084	12.99643	12.71487	13.68791	13.39091	13.18658	12.90007	13.18658	12.90007	17.347752	16.96246	17.34775	16.96246	17.53746	17.14976
390399	3739915	62.89%	5.755151	5.541918	5.755151	5.541918	5.774348	5.559976	6.108521	5.881381	5.931445	5.709947	5.931445	5.709947	7.855601	7.568538	7.855601	7.568538	7.904399	7.614971
381871	3738620	77.40%	14.083772	13.49853	14.08377	13.49853	14.32293	13.72586	15.0846	14.4565	14.53377	13.92993	14.53377	13.92993	19.064017	18.273	19.06402	18.273	19.28183	18.48078
380385	3733112	60.10%	17.030186	16.46755	17.03019	16.46755	17.30544	16.73293	18.22673	17.6238	17.56047	16.97967	17.56047	16.97967	23.09059	22.32979	23.09059	22.32979	23.34446	22.57468
389036	3741241	62.87%	5.895869	5.668537	5.895869	5.668537	5.927132	5.697573	6.265824	6.022905	6.076702	5.840378	6.076702	5.840378	8.039985	7.734883	8.039985	7.734883	8.095721	7.787599
379775	3731051	65.89%	11.264101	10.98535	11.2641	10.98535	11.38374	11.10479	12.00122	11.70672	11.57595	11.29151	11.57595	11.29151	15.39431	15.00729	15.39431	15.00729	15.52386	15.1353
379822	3735045	50.73%	15.958998	15.56824	15.959	15.56824	16.22136	15.828	17.08313	16.66785	16.45577	16.05423	16.45577	16.05423	21.635913	21.10104	21.63591	21.10104	21.8759	21.33728
383537	3739930	65.63%	10.067396	9.676476	10.0674	9.676476	10.20414	9.806604	10.75762	10.33883	10.38269	9.978928	10.38269	9.978928	13.662532	13.13408	13.66253	13.13408	13.80008	13.26554
387465	3742345	55.80%	6.224822	5.918263	6.224822	5.918263	6.271085	5.959264	6.623954	6.295352	6.414287	6.097216	6.414287	6.097216	8.48336	8.069908	8.48336	8.069908	8.548467	8.130115
389765	3740701	57.37%	5.699991	5.539778	5.699991	5.539778	5.722949	5.561796	6.052438	5.881903	5.873913	5.708093	5.873913	5.708093	7.779314	7.562403	7.779314	7.562403	7.829446	7.610841
390098	3740230	59.97%	5.807953	5.559391	5.807953	5.559391	5.829135	5.579652	6.165871	5.901374	5.98614	5.727934	5.98614	5.727934	7.925973	7.591075	7.925973	7.591075	7.976174	7.638709
382957	3740576	73.32%	10.111834	9.66226	10.11183	9.66226	10.25269	9.796519	10.80711	10.32611	10.42724	9.962711	10.42724	9.962711	13.723294	13.11536	13.72329	13.11536	13.86293	13.24846
390623	3740004	62.70%	5.664822	5.477274	5.664822	5.477274	5.683014	5.494351	6.012057	5.812199	5.837987	5.643159	5.837987	5.643159	7.733585	7.48111	7.733585	7.48111	7.781188	7.526585
380096	3734974	51.38%	17.6568	17.11144	17.6568	17.11144	17.96129	17.40821	18.91274	18.3298	18.21451	17.65256	18.21451	17.65256	23.9116	23.17069	23.9116	23.17069	24.18569	23.43722
389847	3741751	59.98%	5.664978	5.491198	5.664978	5.491198	5.690337	5.515015	6.016986	5.831648	5.837848	5.657951	5.837848	5.657951	7.729919	7.494938	7.729919	7.494938	7.78101	7.543935
380473	3734491	45.03%	19.39438	18.78737	19.39438	18.78737	19.73962	19.12363	20.78325	20.13413	20.01387	19.38784	20.01387	19.38784	26.24335	25.4198	26.24335	25.4198	26.55107	25.71886
389894	3738960	64.24%	6.203827	5.971175	6.203827	5.971175	6.224504	5.99202	6.585325	6.338607	6.395807	6.154641	6.395807	6.154641	8.447267	8.139805	8.447267	8.139805	8.49998	8.199948
383041	3739433	72.36%	11.370232	10.86685	11.37023	10.86685	11.53723	11.02585	12.15918	11.62033	11.72915	11.20944	11.72915	11.20944	15.404359	14.73523	15.40436	14.73523	15.56671	14.88973
379899	3739740	72.38%	12.175872	11.83668	12.17587	11.83668	12.37152	12.02686	13.03057	12.6676	12.55507	12.20539	12.55507	12.20539	16.509364	16.04941	16.50936	16.04941	16.69033	16.22521
389193	3738664	64.13%	6.470974	6.250159	6.470974	6.250159	6.495808	6.274986	6.871475	6.637424	6.66031	6.438489	6.66031	6.438489	8.808224	8.515732	8.808224	8.515732	8.865064	8.571076
384704	3739154	63.97%	9.149587	8.810521	9.149587	8.810521	9.256332	8.911894	9.764901	9.401932	9.435819	9.08566	9.435819	9.08566	12.428565	11.96993	12.42857	11.96993	12.54488	12.08114
381437	3734112	50.78%	28.323572	27.25047	28.32357	27.25047	28.90474	27.8099	30.41501	29.26293	29.26375	28.15513	29.26375	28.15513	38.202145	36.74169	38.20215	36.74169	38.69642	37.2172
390296	3737362	56.95%	6.454476	6.105583	6.454476	6.105583	6.470947	6.123529	6.848524	6.479114	6.65601	6.293548	6.65601	6.293548	8.805242	8.333485	8.805242	8.333485	8.858206	8.384228
389492	3740248	59.65%	5.872659	5.667842	5.872659	5.667842	5.897686	5.690845	6.236998	6.018435	6.052787	5.840834	6.052787	5.840834	8.01215	7.735241	8.01215	7.735241	8.064655	7.785182
389517	3739600	62.43%	5.982255	5.795354	5.982255	5.795354	6.006191	5.818262	6.352471	6.153737	6.166169	5.973259	6.166169	5.973259	8.161755	7.907478	8.161755	7.907478	8.214554	7.958438
389536	3740757	59.38%	5.734354	5.57818	5.734354	5.57818	5.759214	5.602227	6.090198	5.923924	5.909568	5.747577	5.909568	5.747577	7.824595	7.613787	7.824595	7.613787	7.875955	7.663475
390248	3737686	60.75%	6.40512	6.05873	6.40512	6.05873	6.421618	6.076935	6.796203	6.429774	6.604939	6.245601	6.604939	6.245601	8.738217	8.268547	8.738217	8.268547	8.790827	8.319182
389459	3737689	58.96%	6.631295	6.353535	6.631295	6.353535	6.652327	6.374472	7.039134	6.744318	6.839031	6.550941	6.839031	6.550941	9.042448	8.666665	9.042448	8.666665	9.09902	8.720946
382217	3738795	72.74%	13.609653	12.74201	13.60965	12.74201	13.83577	12.9489	14.57327	13.64058	14.04423	13.14784	14.04423	13.14784	18.426314	17.25641	18.42631	17.25641	18.63424	17.44852
380194	3736308	59.05%	17.952455	17.23878	17.95246	17.23878	18.28257	17.55492	19.24583	18.48043	18.52788	17.79194	18.52788	17.79194	24.281477	23.31522	24.28148	23.31522	24.57187	23.59378
388854	3740055	57.44%	6.069914	5.866913	6.069914	5.866913	6.098125	5.894475	6.448451	6.232415	6.257242	6.046107	6.257242	6.046107	8.277326	8.004285	8.277326	8.004285	8.332983	8.057872
386767	3739844	59.28%	7.219033	6.846814	7.219033	6.846814	7.277095	6.898635	7.68617	7.287483	7.442894	7.058579	7.442894	7.058579	9.826735	9.323267	9.826735	9.323267	9.905219	9.395998
388039	3738643	65.44%	6.671477	6.369374	6.671477	6.369374	6.70614	6.402206	7.090663	6.768881	6.879531	6.566351	6.879531	6.566351	9.090794	8.682865	9.090794	8.682865	9.154195	8.742925
380825	3733609	51.44%	20.147364	19.50845	20.14736	19.50845	20.50657	19.85601	21.591	20.90614	20.79238	20.1331	20.79238	20.1331	27.25847	26.33246	27.25847	26.33246	27.57871	26.64147
381497	3733030	53.49%	23.690174	22.40961	23.69017	22.40961	24.13687	22.82879	25.40951	24.0333	24.46596	23.14192	24.46596	23.14192	32	30.27555	32	30.27555	32.39188	30.64435
387362	3740183	59.38%	6.849496	6.434157	6.849496	6.434157	6.899044	6.477843	7.288863	6.844464	7.061583	6.631797	7.061583	6.631797	9.327838	8.767413	9.327838	8.767413	9.399511	8.833024
388668	3737492	66.40%	6.817606	6.620608	6.817606	6.620608	6.843862	6.646909	7.240304	7.031462	7.032013	6.828267	7.032013	6.828267	9.291862	9.024015	9.291862	9.024015	9.352471	9.083156
380507	3736370	51.39%	19.429188	18.89834	19.42919	18.89834	19.78849	19.25171	20.83127	20.26542	20.05482	19.50913	20.05482	19.50913	26.271449	25.54622	26.27145	25.54622	26.58725	25.85574
380478	3736076	51.89%	19.82883	19.39862	19.82883	19.39862	20.1984	19.76379	21.26212	20.80396	20.46863	20.02675	20.46863	20.02675	26.806887	26.2183	26.80689	26.2183	27.13093	26.53755
387306	3739448	61.31%	6.877622	6.613419	6.877622	6.613419	6.923506	6.657285	7.316283	7.034916	7.090946	6.818084	7.090946	6.818084	9.367821	9.009085	9.367821	9.009085	9.437953	9.076311
386955	3740430	62.21%	6.948563	6.681502	6.948563	6.681502	7.002871	6.732111	7.396852	7.111235	7.163128	6.887064	7.163128	6.887064	9.461482	9.100465	9.461482	9.100465	9.536071	9.171258
386883	3740498	59.42%	6.95252	6.676458	6.95252	6.676458	7.007389	6.726862	7.401386	7.105733	7.167056	6.881806	7.167056	6.881806	9.466858	9.093785	9.466858	9.093785	9.541725	9.164428
387067	3741097	56.92%	6.653857	6.42794	6.653857	6.42794	6.704572	6.475469	7.081887	6.840199	6.858106	6.624486	6.858106	6.624486	9.063608	8.758381	9.063608	8.758381	9.134158	8.825676
381098	3735252	52.19%	25.091781	24.27619	25.09178	24.27619	25.59188	24.76011	26.93233	26.05711	25.9173	25.07533	25.9173	25.07533	33.868004	32.76617	33.868	32.76617	34.2971	33.18153
381167	3735184	55.92%	24.801656	24.27378	24.80166	24.21288	25.30213	24.70181	26.62564	25.99388	25.61957	25.01138	25.61957	25.01138	33.468444	32.67382	33.46844	32.67382	33.89601	33.09145
387129	3740300	60.17%	6.92435	6.573121	6.92435	6.573121	6.977461	6.620411	7.370386	6.994206	7.138158	6.775396	7.138158	6.775396	9.429143	8.954304	9.429143	8.954304	9.502976	9.022719
381405	3733242	55.91%	23.486728	22.70539	23.48673	22.70539	23.92723	23.13136	25.18951	24.35121	24.25517	23.4471	24.25517	23.4471	31.72772	30.6748	31.72772	30.6748	32.11505	31.049
381411	3733508	55.35%	25.28543	24.1015	25.28543	24.1015	25.77686	24.56692	27.13166	25.85899	26.11741	24.89354	26.11741	24.89354	34.13732	32.54269	34.13732	32.54269	34.56355	32.9473
381414	3733803	54.37%	26.34425	25.40245	26.34425	25.40245	26.86785	25.9066	28.27678	27.26547	27.21459	26.24202	27.21459	26.24202	35.552049	34.28075	35.55205	34.28075	36.00258	34.71487
387721	3742199	55.16%	6.126225	5.916594	6.126225	5.916594	6.168258	5.95703	6.516688	6.29324	6.3128	6.095629	6.3128	6.095629	8.350949	8.067759	8.350949	8.067759	8.413315	8.127693
383262	3736996	66.32%	13.770357	13.13757	13.77036	13.13757	13.986	13.34107	14.738	14.05894	14.21489	13.56091	14.21489	13.56091	18.641915	17.78802	18.64192	17.78802	18.84671	17.98226
382659	3737519	68.63%	15.121422	14.39588	15.12142	14.39588	15.3793	14.63819	16.19845	15.41895	15.61037	14.86077	15.61037	14.86077	20.455627	19.47733	20.45563	19.47733	20.69108	19.69994
382237	3737492	76.70%	16.675203	15.86388	16.6752	15.86388	16.97482	16.14628	17.87381	17.00236	17.2163	16.37841	17.2163	16.37841	22.543879	21.44935	22.5392	21.44935	22.80686	21.70255
381821	3737471	80.22%	17.323432	16.59443	17.32343	16.59443	17.64089	16.89711	18.57302	17.7905	17.88608	17.1333	17.88608	17.1333	23.415454	22.43118	23.41545	22.43118	23.69657	22.69978
382575	3735031	59.68%	15.679763	14.56747	15.67976	14.56747	15.92526	14.76125	16.78267	15.55747	16.18972	15.01227	16.18972	15.01227	21.21868	19.72204	21.13288	19.68684	21.39438	19.89847
382628.5	3735071	59.94%	15.559211	14.59738	15.55921	14.59738	15.80024	14.81176	16.65198	15.31581	16.06556	14.78056	16.06556	14.78056	21.056438	19.76129	21.05644	19.38479	21.28737	19.59271
382704.9	3735128	63.89%	15.248498	14.13683	15.2485	14.13683	15.48141	14.34533	16.31716	15.12202	15.74445	14.59523	15.74445	14.59523	20.6386	19.14184	20.6386	19.14184	20.86327	19.34613
382767.5	3735065	58.03%	14.215407	13.54329	14.21541	13.54329	14.41978	13.73417	15.20232	14.48084	14.67563	13.98149	14.67563	13.98149	19.25265	18.34556	19.25265	18.34556	19.45532	18.53006
382828.6	3735107	58.53%	14.102384	13.29418	14.10238	13.29418	14.30415	13.47885	15.08076	14.21256	14.55892	13.72399	14.55892	13.72399	19.100577	18.01037	19.10058	18.01037	19.30112	18.19512
382858.8	3735097	58.21%	13.870676	13.13325	13.87068	13.13325	14.06575	13.31351	14.83052	14.0043	14.31914	13.54245	14.31914	13.54245	18.789654	17.79471	18.78965	17.79471	18.98529	17.92723
382915.1	3735162	58.85%	13.857627	12.92839	13.85763	12.92839	14.05321	13.09412	14.81705	13.80812	14.30581	13.3355	14.30581	13.3355	18.771487	17.50564	18.77149	17.50564	18.96717	17.68417
383713	3735584	65.28%	11.661543	10.92911	11.66154	10.92911	11.80286	11.05713	12.45258	11.66717	12.03681	11.27989	12.03681	11.27989	15.815289	14.82668	15.81529	14.82668	15.96809	14.96759
383722.9	3735566	63.02%	11.593901	10.92636	11.5939	10.92636	11.73307	11.05411	12.37942	11.66409	11.96692	11.27708	11.96692	11.27708	15.724538	14.82301	15.72454	14.82301	15.87581	14.96378
383697.5	3735551	63.62%	11.649364	10.97551	11.64936	10.97551	11.79011	11.10439	12.43925	11.71699	12.02414	11.32797	12.02414	11.32797	15.799258	14.88905	15.79926	14.88905	15.95173	15.03079
383513.6	3735351	64.00%	11.783678	11.34839	11.78368	11.34839	11.92666	11.48493	12.58299	12.11703	12.16248	11.71229	12.16248	11.71229	15.981615	15.38896	15.98162	15.34676	16.13615	15.53674
382977.5	3735085	49.38%	13.1693	12.68705	13.1693	12.68705	13.34282	12.83915	14.07281	13.55658	13.59306	12.98372	13.59306	12.98372	17.847981	17.17206	17.84798	17.17235	18.02808	17.19655
383145.9	3734712	53.52%	12.637953	12.23713	12.63795	12.23713	12.79595	12.39127	13.49921	13.07186	13.04692	12.6332	13.04692	12.6332	17.131582	16.58736	17.13158	16.58736	17.30011	16.7387
383112.8	3734692	66.18%	12.760652	12.41538	12.76065	12.41538	12.92201	12.57278	13.63142	13.26281	13.17335	12.8167	13.17335	12.8167	17.297257	16.82945	17.29726	16.82945	17.46825	16.98059
383065.6	3734773	58.27%	12.905726	12.46792	12.90573	12.46668	13.0697	12.62439	13.78683	13.31747	13.32273	12.86994	13.32273	12.86994	17.494235	16.89864	17.49424	16.89864	17.66753	17.06575
382925.9	3734712	65.95%	13.713942	13.03669	13.71394	13.03669	13.8982	13.20706	14.65749	13.93019	14.15863	13.45876	14.15863	13.45876	18.580105	17.66703	18.58011	17.66703	18.76952	17.83094
382903.6	3734755	62.71%	13.75754	13.05405	13.75754	13.05405	13.94381	13.22573	14.70504	13.9389	14.20352	13.45908	14.20352	13.45908	18.638627	17.68128	18.63863	17.67894	18.82925	17.84398
382664.8	3734643	55.64%	14.964848	14.28733	14.96485	14.28733	15.1849	14.49383	16.00767	15.28031	15.45126	14.75101	15.45126	14.75101	20.260587	19.34711	20.26059	19.34711	20.47687	19.55163
382810.4	3734273	61.49%	14.698299	13.87497	14.6983	13.87815	14.90829	14.06053	15.71887	14.83746	15.17754	14.31269	15.17754	14.31269	19.900733	18.79113	19.90073	18.79564	20.1103	18.97756
382837.4	3734182	67.27%	14.71052	13.90733	14.71052	13.90789	14.91863	14.04122	15.73063	14.86858	15.18974	14.30159	15.18974	14.30159	19.917674	18.79046	19.91767	18.83551	20.12648	18.98141

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	*2026_ALT1_CAAQS*	*2026_ALT1_NAAQS*	*2026_NP_CAAQS*	*2026_NP_NAAQS*	*2026_ALT3_CAAQS*	*2026_ALT3_NAAQS*	*2026_ALT4_CAAQS*	*2026_ALT4_NAAQS*	*2026_ALT5_CAAQS*	*2026_ALT5_NAAQS*	*2026_PP_CAAQS*	*2026_PP_NAAQS*	*2033_ALT1_CAAQS*	*2033_ALT1_NAAQS*	*2033_NP_CAAQS*	*2033_NP_NAAQS*	*2033_ALT3_CAAQS*	*2033_ALT3_NAAQS*
382763.3	3734087	68.92%	15.257554	14.2228	15.26867	14.30835	15.45608	14.3639	16.33158	15.3003	15.7159	14.60196	15.7159	14.60196	20.665004	19.34594	20.66753	19.37334	20.88353	19.47987
382485.1	3733963	54.21%	17.472457	16.56512	17.47246	16.56512	17.75481	16.82845	18.70892	17.73439	18.04552	17.10849	18.04552	17.10849	23.629017	22.40439	23.62902	22.40439	23.89503	22.65445
382173.4	3733819	61.41%	20.96263	20.16001	20.96263	19.96785	21.34095	20.52378	22.47399	21.34074	21.65385	20.82512	21.65385	20.82512	28.316148	27.23128	28.31615	27.10543	28.65549	27.55766
382203.6	3733740	62.10%	20.833456	19.94388	20.83346	19.93849	21.20678	20.3005	22.33371	21.37429	21.52045	20.60192	21.52045	20.60192	28.143102	26.94105	28.1431	26.93288	28.47901	27.26238
382087.1	3733719	60.26%	22.539331	21.6734	22.53933	21.6734	22.95931	22.07718	24.17399	23.24554	23.28469	22.3911	23.28469	22.3911	30.432893	29.26212	30.43289	29.26212	30.80468	29.61973
382088.9	3733645	61.97%	22.86062	21.74795	22.86062	21.74795	23.28806	22.1527	24.51974	23.32521	23.61724	22.46829	23.61724	22.46829	30.864561	29.36232	30.86456	29.36232	31.24251	29.72107
382015.6	3733643	60.88%	24.216324	23.15399	24.21632	23.15399	24.68108	23.59723	25.98239	24.84213	25.01926	23.92255	25.01926	23.92255	32.684365	31.24972	32.68437	31.24972	33.09095	31.63798
382015.2	3733608	60.06%	24.366371	23.23192	24.35898	23.23133	24.83208	23.67691	26.13605	24.92526	25.16665	24.00246	25.16665	24.00246	32.876205	31.35374	32.87621	31.35374	33.28559	31.74348
382530.1	3735089	60.33%	16.922513	15.55389	16.92251	15.24859	17.2032	15.48907	18.12419	16.32225	17.47515	15.74425	17.47515	15.74425	22.885593	20.63487	22.88559	20.61947	23.14632	20.86311
382552.6	3735060	58.45%	16.300365	15.01851	16.30037	14.91931	16.5631	15.14975	17.45235	15.69101	16.83164	15.31089	16.83164	15.31089	22.051517	20.19398	22.05152	19.85168	22.2986	20.06721
382601.8	3735051	59.43%	15.630287	14.52142	15.63029	14.52142	15.87378	14.74047	16.72893	15.44014	16.13883	14.89948	16.13883	14.89948	21.151877	19.65964	21.15188	19.53954	21.38451	19.74998
382666.7	3735100	61.56%	15.423504	14.35507	15.4235	14.35507	15.66071	14.56911	16.50553	15.26375	15.92544	14.73111	15.92544	14.73111	20.873951	19.43541	20.87395	19.31931	21.10197	19.5262
382736.2	3735096	61.12%	14.620903	13.76861	14.6209	13.76861	14.83625	13.9661	15.63976	14.72418	15.09508	14.21436	15.09508	14.21436	19.796762	18.64797	19.79676	18.64797	20.00805	18.84415
382798	3735086	58.47%	14.173924	13.39245	14.17392	13.39245	14.37727	13.57955	15.15771	14.31836	14.63293	13.8254	14.63293	13.8254	19.196854	18.14288	19.19685	18.14288	19.39879	18.32915
382887	3735129	58.39%	13.886757	13.05706	13.88676	13.052	14.08245	13.2304	14.84802	13.95157	14.33599	13.47351	14.33599	13.47351	18.810907	17.68516	18.81091	17.68516	19.00691	17.86636
382957.1	3735184	58.08%	13.68909	12.73839	13.68909	12.72892	13.88053	12.90004	14.63548	13.60397	14.13139	13.13909	14.13139	13.13909	18.545182	17.25109	18.54518	17.25109	18.73754	17.4249
382999.1	3735206	57.95%	13.556454	12.59268	13.55645	12.56198	13.74355	12.72863	14.49209	13.42399	13.99475	12.96657	13.99475	12.96657	18.366494	17.02661	18.36649	17.02661	18.55583	17.19691
383041.1	3735228	57.89%	13.464195	12.42508	13.4642	12.40247	13.64852	12.56569	14.39256	13.25247	13.89972	12.80141	13.89972	12.80141	18.241966	16.81236	18.24197	16.81236	18.42939	16.98007
383083.1	3735251	57.81%	13.401048	12.27907	13.40105	12.26375	13.584	12.42349	14.32479	13.10314	13.83464	12.65828	13.83464	12.65828	18.156519	16.62531	18.15652	16.62531	18.34278	16.79112
383125.1	3735273	59.07%	13.305666	12.12473	13.30567	12.11557	13.48693	12.27177	14.22246	12.94373	13.73601	12.50534	13.73601	12.50534	18.027897	16.42539	18.0279	16.42539	18.21257	16.58742
383167	3735295	58.75%	13.179691	12	13.17969	11.98848	13.35892	12.14133	14.08751	12.80692	13.60556	12.37453	13.60556	12.37453	17.85833	16.25339	17.85833	16.25339	18.04107	16.4126
383209	3735317	59.17%	13.049787	11.88423	13.04979	11.86743	13.22659	12.01774	13.94813	12.67696	13.4712	12.24969	13.4712	12.24969	17.683181	16.0615	17.68318	16.0615	17.86373	16.21924
383251	3735339	59.32%	12.92703	11.83732	12.92703	11.7786	13.10109	11.92754	13.81616	12.58185	13.3445	12.15784	13.3445	12.15784	17.517488	15.96975	17.51749	15.83395	17.69581	15.98897
383293	3735362	58.90%	12.794924	11.73613	12.79492	11.73613	12.96604	11.88483	13.67412	12.53665	13.20791	12.11389	13.20791	12.11389	17.339683	15.9122	17.33968	15.6106	17.51555	15.88862
383335	3735384	58.64%	12.665631	11.6436	12.66563	11.62461	12.83379	11.77028	13.53498	12.41641	13.07405	11.99878	13.07405	11.99878	17.166055	15.76202	17.16606	15.56302	17.33947	15.8714
383377	3735406	58.52%	12.54718	11.53463	12.54718	11.45422	12.71233	11.59574	13.40737	12.2329	12.95161	11.82239	12.95161	11.82239	17.006722	15.53331	17.00672	15.49041	17.17781	15.68471
383419	3735428	58.74%	12.420321	11.43867	12.42032	11.43867	12.58245	11.51489	13.2708	12.148	12.82035	11.74102	12.82035	11.74102	16.836322	15.42731	16.83632	15.42531	17.0049	15.57706
383461	3735451	59.15%	12.311365	11.33242	12.31137	11.33242	12.47045	11.45117	13.1533	12.08096	12.70789	11.67648	12.70789	11.67648	16.689568	15.34345	16.68957	15.34345	16.85593	15.49203
383503	3735473	60.74%	12.210426	11.2521	12.21043	11.2521	12.3665	11.38871	13.04434	12.01531	12.60385	11.61346	12.60385	11.61346	16.553519	15.26147	16.55352	15.26147	16.71773	15.4089
383545	3735495	60.44%	12.100617	11.18072	12.10062	11.18072	12.25367	11.31574	12.92591	11.93853	12.49045	11.53955	12.49045	11.53955	16.405787	15.16559	16.40579	15.16559	16.56765	15.31169
383587	3735517	60.62%	11.981973	11.13034	11.98197	11.13034	12.13203	11.26368	12.79809	11.88406	12.36774	11.48773	12.36774	11.48773	16.246383	15.09748	16.24638	15.09748	16.40588	15.24249
383629	3735539	62.55%	11.85453	11.07477	11.85453	11.07477	12.00163	11.20638	12.66093	11.82403	12.2358	11.43051	12.2358	11.43051	16.075254	15.0225	16.07525	15.0225	16.23239	15.16631
383671	3735562	63.52%	11.758487	11.00761	11.75849	11.00761	11.90266	11.13745	12.55722	11.75165	12.13679	11.36114	12.13679	11.36114	15.945809	14.93212	15.94581	14.93212	16.1008	15.07457
383666.9	3735518	61.20%	11.675552	10.97814	11.67555	10.97814	11.81705	11.10666	12.46744	11.71955	12.05096	11.33075	12.05096	11.33075	15.834923	14.8927	15.83492	14.8927	15.98792	15.02533
383636.2	3735484	59.71%	11.699802	10.96813	11.6998	10.96813	11.8419	11.09621	12.49351	11.70861	12.07585	11.32032	12.07585	11.32032	15.867955	14.87953	15.86796	14.87953	16.02132	15.00689
383605.5	3735451	60.53%	11.73936	11.1228	11.73936	11.1228	11.88192	11.255	12.53581	11.87537	12.1169	11.48019	12.1169	11.48019	15.921152	15.08734	15.92115	14.99805	16.07511	15.22096
383574.9	3735417	61.64%	11.76654	11.2604	11.76654	11.2604	11.90937	11.39433	12.56481	12.0238	12.14501	11.61717	12.14501	11.61717	15.957794	15.26608	15.95779	14.95121	16.11219	15.19349
383544.2	3735384	62.08%	11.78124	11.31861	11.78124	11.31861	11.92422	11.45287	12.58046	12.08314	12.16014	11.67937	12.16014	11.67937	15.977943	15.34579	15.97794	15.03	16.13238	15.2016
383468.9	3735329	63.59%	11.872542	11.40615	11.87254	11.40615	12.01834	11.54458	12.67901	12.17984	12.25401	11.77277	12.25401	11.77277	16.101443	15.46771	16.10144	15.33161	16.25798	15.56129
383424.2	3735306	62.98%	11.984777	11.44897	11.98478	11.44897	12.1334	11.58678	12.79992	12.22416	12.37007	11.81525	12.37007	11.81525	16.25236	15.52326	16.25236	15.36686	16.41107	15.61514
383379.6	3735284	62.50%	12.101352	11.49359	12.10135	11.49359	12.25275	11.63211	12.92539	12.27193	12.49064	11.86136	12.49064	11.86136	16.409083	15.58359	16.40908	15.48059	16.56996	15.6301
383334.9	3735262	62.15%	12.226093	11.54801	12.22609	11.54801	12.3802	11.68977	13.05949	12.33249	12.61967	11.91071	12.61967	11.91071	16.576895	15.66023	16.5769	15.64903	16.74017	15.8004
383290.2	3735240	61.51%	12.352384	11.60937	12.35238	11.60937	12.50907	11.74917	13.19513	12.39527	12.75026	11.97601	12.75026	11.97601	16.747045	15.7337	16.74705	15.7337	16.91251	15.8854
383245.6	3735218	60.90%	12.464004	11.77701	12.464	11.77701	12.62301	11.91706	13.31498	12.57194	12.86546	12.15036	12.86546	12.15036	16.897808	15.9603	16.89781	15.9603	17.06521	16.11405
383200.9	3735196	59.90%	12.580446	11.97878	12.58045	11.97878	12.74124	12.11827	13.43961	12.78364	12.98574	12.35402	12.98574	12.35402	17.055329	16.22532	17.05533	16.22532	17.22444	16.38338
383156.2	3735174	57.78%	12.724234	12.11436	12.72423	12.11436	12.88661	12.26647	13.59316	12.93978	13.13457	12.50217	13.13457	12.50217	17.249541	16.42551	17.24954	16.42433	17.42	16.56437
383111.5	3735152	52.64%	12.938109	12.21001	12.93811	12.21001	13.10373	12.36448	13.82292	13.04261	13.35448	12.60017	13.35448	12.60017	17.537642	16.5554	17.53764	16.55472	17.71055	16.69598
383066.9	3735130	52.50%	13.076742	12.38232	13.07674	12.38232	13.24535	12.54043	13.97211	13.22828	13.49716	12.76753	13.49716	12.76753	17.724554	16.78765	17.72455	16.7799	17.89944	16.86101
383022.2	3735107	51.16%	13.135597	12.53359	13.1356	12.53359	13.30682	12.67583	14.03599	13.39113	13.55786	12.90759	13.55786	12.90759	17.801854	16.96549	17.80402	16.96945	17.98086	17.11836
382996.2	3735044	47.12%	13.093126	12.49648	13.09313	12.49648	13.26426	12.65811	13.98996	13.35141	13.51527	12.73431	13.51527	12.73431	17.747276	16.93876	17.74728	16.93876	17.92523	16.8601
383014.9	3735002	47.66%	12.964625	12.49727	12.96463	12.49727	13.12915	12.65692	13.84852	13.31883	13.38038	12.71921	13.38038	12.71921	17.572459	16.93955	17.57246	16.93955	17.74717	16.87033
383033.7	3734961	47.23%	12.93346	12.40124	12.93576	12.4017	13.09843	12.48352	13.81658	13.16876	13.3504	12.72583	13.3504	12.72583	17.53347	16.8123	17.53347	16.7426	17.70724	16.87923
383052.4	3734919	48.00%	12.880106	12.33998	12.88225	12.34001	13.0433	12.47977	13.75887	13.16499	13.29539	12.72248	13.29539	12.72248	17.461725	16.73024	17.46173	16.73024	17.63422	16.8747
383071.1	3734878	50.24%	12.820798	12.30576	12.8208	12.30622	12.98243	12.46009	13.69501	13.14427	13.23434	12.70255	13.23434	12.70255	17.381468	16.68406	17.38147	16.68406	17.55285	16.84808
383089.8	3734836	50.58%	12.784798	12.27677	12.78502	12.2769	12.94577	12.43081	13.65654	13.11344	13.19755	12.67292	13.19755	12.67292	17.332026	16.64408	17.33203	16.64408	17.50288	16.80782
383108.5	3734795	52.57%	12.735415	12.24801	12.73542	12.24801	12.89567	12.40074	13.60383	13.08308	13.14694	12.64233	13.14694	12.64233	17.264291	16.60184	17.26429	16.60184	17.43452	16.7655
383127.2	3734754	52.11%	12.684418	12.3193	12.68442	12.3193	12.84367	12.38842	13.54922	13.0702	13.09461	12.6299	13.09461	12.6299	17.194754	16.58396	17.19475	16.58619	17.36415	16.74766
383089.2	3734733	63.11%	12.824488	12.4468	12.82449	12.4468	12.98732	12.59314	13.69996	13.28428	13.2389	12.83748	13.2389	12.83748	17.384201	16.85507	17.3842	16.85507	17.55629	17.02215
383030.6	3734758	60.59%	13.147241	12.63835	13.14724	12.63835	13.29351	12.76774	14.02235	13.46821	13.54946	13.01479	13.54946	13.01479	17.789091	17.08835	17.78909	17.08835	17.96631	17.25793
382995.7	3734743	60.32%	13.363387	12.87673	13.36339	12.87673	13.53733	13.04256	14.27892	13.74683	13.77316	13.28184	13.77316	13.28184	18.080039	17.45114	18.08004	17.43501	18.26147	17.60938
382960.8	3734727	62.71%	13.547339	12.9613	13.54734	12.9613	13.7265	13.12928	14.47748	13.84862	13.98648	13.38077	13.98648	13.38077	18.347173	17.56614	18.35665	17.56614	18.5284	17.71678
382863.8	3734736	62.22%	13.957446	13.2779	13.95745	13.2779	14.14948	13.45581	14.92081	14.18636	14.41029	13.70672	14.41029	13.70672	18.906809	17.99063	18.90681	17.99063	19.10185	18.14373
382824	3734718	61.15%	14.173311	13.41418	14.17331	13.41418	14.37113	13.59644	15.15363	14.33834	14.63361	13.84866	14.63361	13.84866	19.196539	18.17387	19.19654	18.17387	19.39604	18.34761
382784.2	3734699	60.16%	14.386917	13.65448	14.38692	13.65448	14.59051	13.84338	15.38397	14.5976	14.85434	14.09696	14.85434	14.09696	19.483665	18.49686	19.48367	18.49686	19.6876	18.68441
382744.4	3734681	59.88%	14.585192	13.762	14.58519	13.762	14.79445	13.95374	15.59797	14.71333	15.05911	14.20801	15.05911	14.20801	19.750534	18.64159	19.75053	18.64159	19.95864	18.83489
382704.6	3734662	59.78%	14.759136	14.08725	14.75914	14.08725	14.97391	14.28756	15.78597	15.06408	15.23833	14.54443	15.23833	14.54443	19.984663	19.07821	19.98466	19.07821	20.19672	19.27817
382683	3734597	54.91%	14.980543	14.29517	14.98054	14.29517	15.20011	14.50095	16.02407	15.2881	15.46776	14.75925	15.46776	14.75925	20.281841	19.35798	20.28184	19.35798	20.49801	19.56223
382701.2	3734551	56.58%	14.94336	14.23001	14.94336	14.23001	15.16191	14.43385	15.98403	15.21785	15.4295	14.6922	15.4295	14.6922	20.231232	19.26978	20.23123	19.26978	20.44669	19.47267
382719.4	3734504	58.05%	14.899646	14.13907	14.89965	14.13907	15.11717	14.34052	15.93717	15.11992	15.38462	14.59858	15.38462	14.59858	20.172036	19.14706	20.17204	19.14706	20.38666	19.34809
382737.6	3734458	60.29%	14.857754	14.0481	14.85775	14.0481	15.074	14.18322	15.89185	15.02175	15.3415	14.43826	15.3415	14.43826	20.115209	19.02455	20.11521	19.02455	20.32892	19.21522
382755.8	3734412	59.65%	14.829943	13.99353	14.82994	13.99514	15.04496	14.149	15.86165	14.9627	15.31301	14.40651	15.31301	14.40651	20.077668	18.95344	20.07767	18.95344	20.29056	19.14232
382774	3734365	58.07%	14.781205	13.99702	14.78121	13.99893	14.99463	14.15916	15.80893	14.96641	15.26282	14.41745	15.26282	14.41745	20.012182	18.95514	20.01218	18.95803	20.22401	19.153
382792.2	3734319	62.41%	14.738564	13.96118	14.73856	13.96748	14.95024	14.15658	15.76262	14.93412	15.21882	14.23078	15.21882	14.23078	19.954703	18.91323	19.9547	18.91564	20.16538	19.10387
382823.9	3734227	55.78%	14.707491	13.89321	14.70749	13.89486	14.91665	14.02854	15.72808	14.85497	15.1872	14.28859	15.1872	14.28859	19.913235	18.74153	19.91324	18.81813	20.12256	18.93525
382812.7	3734150	66.40%	14.884935	13.95453	14.88633	13.99132	15.09749	14.10656	15.91998	14.95858	15.37093	14.34104	15.37093	14.34104	20.153798	18.93465	20.1538	18.94746	20.36406	19.08505
382788	3734119	67.40%	15.076011	14.08415	15.08203	14.17075	15.25777	14.21808	16.13069	15.15212	15.52296	14.4556	15.52296	14.4556	20.414149	19.15901	20.41671	19.18853	20.62985	19.28468
382723.6	3734069	67.84%	15.503986	14.52671	15.52933	14.65768	15.70678	14.68531	16.61231	15.67656	15.98507	14.92827	15.98507	14.92827	21.013116	19.80232	21.01791	19.8423	21.23809	19.89398
382683.8	3734052	71.20%	15.785217	14.90313	15.78896	14.99278	15.99828	15.05934	16.89199	16.03785	16.25473	15.30586	16.25473	15.30586	21.364759	20.26671	21.36689	20.29262	21.59133	20.41455
382644.1	3734034	70.33%	16.132256	15.32365	16.13645	15.35453	16.37647	15.51437	17.26674	16.42782	16.66104	15.75992	16.66104	15.75992	21.833696	20.77438	21.8337	20.77852	22.06473	20.97535
382604.3	3734016	67.48%	16.474962	15.68991	16.47496	15.69472	16.7287	15.92757	17.63213	16.79483	17.01492	16.19361	17.01492	16.19361	22.288868	21.22843	22.28887	21.23573	22.53332	21.45983
382564.6	3733999	59.00%	16.824115	15.97258	16.82412	15.97258	17.08763	16.21828	18.00883	17.09439	17.37556	16.49617	17.37556	16.49617	22.757969	21.60883	22.75797	21.60883	23.00987	21.84581
382524.8	3733981	54.88%	17.144656	16.32163	17.14466	16.32163	17.41763	16.57737	18.35509	17.47117	17.70674	16.85706	17.70674	16.85706	23.188742	22.07734	23.18874	22.07734	23.44773	22.32186
382440.6	3733943	53.03%	17.851339	16.9557	17.85134	16.9557	18.14414	17.2301	19.1176	18.15596	18.43716	17.51237	18.43716	17.51237	24.13765	22.92844	24.13765	22.92844	24.41163	23.18693
382396	3733922	53.12%	18.267661	17.53648	18.26766	17.53648	18.57191	17.82667	19.5667	18.78243	18.86747	18.11295	18.86747	18.11295	24.696934	23.70821	24.69693	23.70821	24.97963	23.97877
382351.5	3733901	56.14%	18.708598	18.20215	18.7086	18.20215	19.02542	18.51115	20.04267	19.50095	19.32329	18.80141	19.32329	18.80141	25.289197	24.60141	25.2892	24.60141	25.58136	24.88628
382307	3733881	58.34%	19.230838	18.85843	19.23084	18.85843	19.56191	19.185	20.60599	20.20877	19.86314	19.4803	19.86314	19.4803	25.990466	25.48243	25.99047	25.48243	26.29361	25.78093
382262.4	3733860	59.35%	19.761394	19.2525	19.76139	19.2525	20.10731	19.59067	21.17846	20.63421	20.41162	19.88721	20.41162	19.88721	26.703235	26.01214	26.70324	26.01214	27.01756	26.31927

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	*2026_ALT1_CAAQS*	*2026_ALT1_NAAQS*	*2026_NP_CAAQS*	*2026_NP_NAAQS*	*2026_ALT3_CAAQS*	*2026_ALT3_NAAQS*	*2026_ALT4_CAAQS*	*2026_ALT4_NAAQS*	*2026_ALT5_CAAQS*	*2026_ALT5_NAAQS*	*2026_PP_CAAQS*	*2026_PP_NAAQS*	*2033_ALT1_CAAQS*	*2033_ALT1_NAAQS*	*2033_NP_CAAQS*	*2033_NP_NAAQS*	*2033_ALT3_CAAQS*	*2033_ALT3_NAAQS*
382217.9	3733840	60.05%	20.359598	19.6659	20.3596	19.6659	20.72186	20.01586	21.82377	21.08034	21.03012	20.31436	21.03012	20.31436	27.506726	26.56758	27.50673	26.56758	27.83352	26.88341
382188.5	3733780	63.15%	20.904486	20.05502	20.90449	19.96555	21.28045	20.41539	22.41079	21.40396	21.59387	20.71664	21.59387	20.71664	28.238383	27.09034	28.23838	26.96907	28.57615	27.41425
382165.1	3733729	59.79%	21.28217	20.61945	21.28217	20.61945	21.66822	20.99504	22.81811	22.10894	21.98476	21.30105	21.98476	21.30105	28.745095	27.84689	28.7451	27.84689	29.09068	28.18268
382125.9	3733726	60.50%	21.799973	21.08815	21.79997	21.08815	22.19984	21.47589	23.37644	22.61415	22.52001	21.78577	22.52001	21.78577	29.440465	28.47646	29.44047	28.47646	29.79681	28.82179
382088	3733682	61.23%	22.698918	21.7151	22.69892	21.7151	23.12263	22.11948	24.34572	23.29012	23.44996	22.43433	23.44996	22.43433	30.647389	29.31808	30.64739	29.31808	31.02222	29.67638
382052.3	3733644	61.27%	23.514171	22.4504	23.51417	22.4504	23.95957	22.8744	25.22488	24.08304	24.29318	23.1948	24.29318	23.1948	31.741778	30.30522	31.74178	30.30522	32.13359	30.67873
381977.3	3733607	61.01%	24.989148	23.9525	24.98095	23.9524	25.47422	24.41729	26.80715	25.70313	25.81773	24.74813	25.81773	24.74813	33.711677	32.32193	33.71168	32.32193	34.13417	32.72686
382569.5	3735119	62.32%	16.933298	15.41349	16.9333	15.40568	17.21357	15.65054	18.13549	16.31639	17.4869	15.73865	17.4869	15.73865	22.899274	20.62676	22.89927	20.62676	23.15999	20.85511
382609	3735150	64.56%	16.872912	15.46072	16.87291	15.46072	17.1512	15.69398	18.0703	16.31748	17.42487	15.70417	17.42487	15.70417	22.817688	20.53362	22.81769	20.34052	23.07698	20.5644
382648.5	3735181	65.71%	16.726327	15.20806	16.72633	15.20806	17.00109	15.43899	17.91248	16.23822	17.27348	15.55433	17.27348	15.55433	22.620053	20.38474	22.62005	20.38474	22.87661	20.60961
382515.2	3735111	61.01%	17.34328	15.90788	17.34328	15.90788	17.63645	16.13114	18.57889	16.68213	17.91051	16.08882	17.91051	16.08882	23.44943	21.08082	23.44943	21.08082	23.71948	21.31654
382740.6	3735163	63.59%	15.140059	14.02208	15.14006	13.97838	15.37123	14.18328	16.20094	14.95166	15.6321	14.43151	15.6321	14.43151	20.492415	18.92796	20.49242	18.92796	20.7154	19.12943
382744.4	3735213	66.38%	15.628553	14.58125	15.62855	14.58125	15.87508	14.80433	16.72937	15.60331	16.13763	14.49213	16.13763	14.49213	21.146646	19.00444	21.14665	19.00444	21.38087	19.20809
382678.6	3735218	67.41%	16.736119	15.3655	16.73612	15.3655	17.01247	15.60314	17.92404	16.43487	17.28363	15.66155	17.28363	15.66155	22.632164	20.18	22.63216	19.9773	22.88952	20.26249
382807.6	3735167	64.81%	14.461419	13.77538	14.46142	13.77538	14.67451	13.97464	15.46905	14.73269	14.93016	14.22193	14.93016	14.22193	19.5815	18.54177	19.5815	18.41657	19.79042	18.60993
382780.1	3735248	66.12%	15.466559	14.33496	15.46656	14.33496	15.71015	14.55253	16.5555	15.33855	15.96991	14.7471	15.96991	14.7471	20.928221	19.15559	20.92822	19.15559	21.15982	19.36215
382843.3	3735202	63.60%	14.339812	13.68158	14.33981	13.66888	14.55052	13.86666	15.33847	14.61877	14.80441	14.11166	14.80441	14.11166	19.417663	18.51121	19.41766	18.42511	19.62451	18.70687
382875.1	3735144	58.78%	14.025294	13.16119	14.02529	13.16119	14.2253	13.31003	14.9978	14.02843	14.47932	13.5234	14.47932	13.5234	18.996718	17.74972	18.99672	17.74972	19.19584	17.93171
382891.3	3735191	62.05%	14.083759	13.20112	14.08376	13.20112	14.28666	13.38554	15.06176	14.11379	14.53969	13.62779	14.53969	13.62779	19.074365	17.77685	19.07437	17.75025	19.2754	17.93366
382854.2	3735251	62.71%	14.503956	13.75703	14.50396	13.75703	14.72037	13.95872	15.51648	14.7149	14.97424	14.12739	14.97424	14.12739	19.637075	18.53056	19.63708	18.53056	19.84804	18.7273
382907.6	3735238	63.03%	14.015532	13.33844	14.01553	13.16571	14.21847	13.34833	14.98946	14.0739	14.46907	13.58825	14.46907	13.58825	18.981924	17.83147	18.98192	17.83147	19.18242	18.01718
382975.7	3735250	62.28%	13.774569	12.85586	13.77457	12.65972	13.9693	12.83109	14.72862	13.53079	14.22031	13.06757	14.22031	13.06757	18.658395	17.15683	18.6584	17.15683	18.85316	17.33167
383017.7	3735273	62.10%	13.687258	12.57889	13.68726	12.56483	13.87961	12.73417	14.63445	13.42887	14.13043	12.84752	14.13043	12.84752	18.540201	16.85468	18.5402	16.85468	18.73317	17.02518
383059.7	3735295	60.74%	13.627998	12.4826	13.628	12.36247	13.81845	12.52663	14.57042	13.21078	14.06932	12.76028	14.06932	12.76028	18.460454	16.74975	18.46045	16.70585	18.65206	16.91875
383101.7	3735317	59.05%	13.535542	12.41343	13.53554	12.35225	13.72394	12.51595	14.47102	13.19978	13.97379	12.7502	13.97379	12.7502	18.335922	16.63443	18.33592	16.51193	18.52597	16.80174
383143.7	3735339	58.05%	13.413893	12.33992	13.41389	12.292	13.59994	12.45399	14.34044	13.1349	13.84776	12.68841	13.84776	12.68841	18.17237	16.56397	18.17237	16.50067	18.36022	16.66593
383185.7	3735361	59.12%	13.279263	12.23501	13.27926	12.23501	13.46266	12.39553	14.19581	13.07361	13.70834	12.6299	13.70834	12.6299	17.99143	16.53425	17.99143	16.32535	18.17688	16.66789
383227.7	3735384	60.71%	13.151991	12.04874	13.15199	12.04874	13.33246	12.20521	14.05901	12.87338	13.57702	12.43731	13.57702	12.43731	17.819649	16.30673	17.81965	16.20493	18.0028	16.46962
383269.7	3735406	62.53%	13.013139	11.89309	13.01314	11.89309	13.19046	12.04644	13.90967	12.7062	13.43351	12.27621	13.43351	12.27621	17.632559	16.07538	17.63256	16.06798	17.81319	16.23519
383311.7	3735428	64.40%	12.866514	11.81431	12.86651	11.81431	13.04061	11.96586	13.75199	12.62146	13.28178	12.19474	13.28178	12.19474	17.435519	16.01668	17.43552	16.01668	17.61332	16.17573
383353.6	3735450	65.23%	12.737308	11.64685	12.73731	11.64685	12.90823	11.79433	13.61284	12.4411	13.14815	12.02139	13.14815	12.02139	17.261815	15.79189	17.26182	15.79189	17.43714	15.94769
383395.6	3735473	66.02%	12.604128	11.51932	12.60413	11.51932	12.77184	11.6632	13.46944	12.30354	13.01036	11.88972	13.01036	11.88972	17.082878	15.62036	17.08288	15.62036	17.25561	15.77343
383437.6	3735495	66.67%	12.482781	11.45758	12.48278	11.45758	12.64729	11.59998	13.33866	12.23706	12.885	11.82589	12.885	11.82589	16.919635	15.53731	16.91964	15.53731	17.08989	15.68912
383479.6	3735517	67.15%	12.375666	11.38601	12.37567	11.38601	12.53696	11.52682	13.22303	12.16009	12.77456	11.75182	12.77456	11.75182	16.775257	15.44107	16.77526	15.44107	16.94318	15.59165
383521.6	3735539	67.40%	12.262104	11.31005	12.2621	11.31005	12.42022	11.44919	13.10053	12.07838	12.65734	11.67316	12.65734	11.67316	16.622455	15.33912	16.62246	15.33912	16.78796	15.48817
383563.6	3735561	67.24%	12.140117	11.25156	12.14012	11.25156	12.29509	11.38894	12.96908	12.01524	12.53124	11.61288	12.53124	11.61288	16.458397	15.26025	16.4584	15.26025	16.62148	15.40806
383605.6	3735584	66.51%	12.009957	11.19588	12.00996	11.19588	12.16182	11.33144	12.82895	11.95507	12.39654	11.55561	12.39654	11.55561	16.283643	15.18508	16.28364	15.18508	16.44419	15.33169
383647.6	3735606	65.50%	11.896047	11.12914	11.89605	11.12914	12.04484	11.26284	12.70612	11.88309	12.27886	11.48671	12.27886	11.48671	16.130394	15.09519	16.13039	15.09519	16.28867	15.23873
383689.6	3735628	68.52%	11.796478	11.03628	11.79648	11.03628	11.94224	11.16769	12.59861	11.78308	12.1762	11.39064	12.1762	11.39064	15.996232	14.97039	15.99623	14.97039	16.15236	15.1138
382952.3	3735295	62.32%	13.895393	13.14377	13.89539	13.14377	14.09506	13.33008	14.85995	14.05412	14.34513	13.45922	14.34513	13.45922	18.819761	17.66379	18.81976	17.66379	19.01785	17.84746
382994.3	3735317	63.09%	13.766367	12.95219	13.76637	12.95219	13.96236	13.13328	14.72079	13.84767	14.21213	13.35382	14.21213	13.35382	18.645598	17.52526	18.6456	17.36266	18.8411	17.70697
383036.3	3735339	63.57%	13.716229	12.81901	13.71623	12.81901	13.91043	12.99692	14.66645	13.70418	14.16051	13.11361	14.16051	13.11361	18.578249	17.21443	18.57825	17.15813	18.7724	17.39148
383078.3	3735361	63.77%	13.62997	12.65984	13.62997	12.65984	13.82208	12.83324	14.57367	13.53248	14.07131	13.02852	14.07131	13.02852	18.462116	17.1026	18.46212	17.1026	18.65463	17.27786
383120.3	3735383	64.00%	13.525936	12.5936	13.52594	12.5936	13.7157	12.76471	14.46163	13.46085	13.96355	12.93255	13.96355	12.93255	18.322565	16.97686	18.32257	16.97686	18.51301	17.15004
383162.3	3735406	64.76%	13.388737	12.38375	13.38874	12.38375	13.57582	12.54889	14.31429	13.2344	13.82132	12.74994	13.82132	12.74994	18.138342	16.73882	18.13834	16.73882	18.3265	16.90819
383204.3	3735428	65.65%	13.273744	12.23285	13.27374	12.23285	13.45792	12.39458	14.1905	13.07213	13.70275	12.62762	13.70275	12.62762	17.983183	16.57929	17.98318	16.46919	18.16906	16.63476
383246.3	3735450	66.95%	13.125687	12.04653	13.12569	12.04653	13.30661	12.20447	14.03144	12.87197	13.54977	12.43479	13.54977	12.43479	17.783613	16.3286	17.78361	16.276	17.9668	16.43909
383288.3	3735472	68.43%	12.975407	11.95633	12.97541	11.95633	13.15302	12.11232	13.86983	12.77501	13.39432	12.34147	13.39432	12.34147	17.581496	16.20729	17.5815	16.08529	17.76188	16.35927
383330.3	3735495	69.73%	12.840928	11.81128	12.84093	11.81128	13.01531	11.96366	13.725	12.61875	13.25516	12.1914	13.25516	12.1914	17.400863	16.01249	17.40086	16.01249	17.57863	16.17187
383372.3	3735517	71.01%	12.708764	11.70951	12.70876	11.70951	12.8799	11.85918	13.58267	12.50904	13.11848	12.08624	13.11848	12.08624	17.223226	15.87558	17.22323	15.87558	17.39843	16.03296
383414.3	3735539	72.24%	12.582355	11.54788	12.58236	11.54788	12.75023	11.69333	13.44647	12.33482	12.98782	11.91912	12.98782	11.91912	17.053265	15.65854	17.05327	15.65854	17.22587	15.81249
383456.3	3735561	73.09%	12.468689	11.39386	12.46869	11.39386	12.63329	11.53544	13.32382	12.16889	12.87055	11.75975	12.87055	11.75975	16.90013	15.45161	16.90013	15.45161	17.07034	15.60257
383498.3	3735583	72.70%	12.355377	11.23629	12.35538	11.23629	12.51675	11.37401	13.20158	11.99916	12.75364	11.59668	12.75364	11.59668	16.74749	15.24011	16.74749	15.24011	16.91543	15.38792
383540.2	3735606	72.35%	12.233953	11.09479	12.23395	11.09479	12.39213	11.22879	13.0707	11.84663	12.62818	11.45038	12.62818	11.45038	16.584205	15.04997	16.58421	15.04997	16.74955	15.19495
383582.2	3735628	72.04%	12.104331	11.01862	12.10433	11.01862	12.25934	11.15017	12.93111	11.7643	12.49409	11.37192	12.49409	11.37192	16.410085	14.94728	16.41009	14.94728	16.57294	15.09048
383624.2	3735650	71.70%	11.976255	10.95938	11.97626	10.95938	12.12812	11.08921	12.79317	11.7004	12.36157	11.31085	12.36157	11.31085	16.237986	14.86745	16.23799	14.86745	16.39835	15.00938
383666.2	3735672	71.22%	11.877124	10.88642	11.87712	10.88642	12.02588	11.01448	12.68607	11.62183	12.25938	11.23539	12.25938	11.23539	16.104501	14.76938	16.1045	14.76938	16.26253	14.90992
382886.9	3735317	66.47%	14.680251	13.80038	14.68025	13.80038	14.90308	14.005	15.70772	14.7629	15.15664	14.24793	15.15664	14.24793	19.872619	18.44438	19.87262	18.44438	20.08801	18.72273
382928.9	3735339	66.88%	14.381949	13.55839	14.38195	13.55839	14.59609	13.7571	15.3857	14.50222	14.8334	13.9974	14.8334	13.9974	19.452393	18.29505	19.45239	18.29505	19.661	18.4892
382970.9	3735361	67.77%	14.164004	13.32621	14.164	13.32388	14.37216	13.51632	15.15063	14.24939	14.59325	13.75509	14.59325	13.75509	19.139563	18.01551	19.13956	18.01551	19.34328	18.2355
383012.9	3735383	68.85%	13.959204	13.18059	13.9592	13.18059	14.16106	13.35893	14.92931	14.08391	14.38575	13.59603	14.38575	13.59603	18.870095	17.72025	18.8701	17.72025	19.0694	18.02678
383054.9	3735405	69.31%	13.720341	12.9997	13.72034	12.9997	13.91629	13.18366	14.67204	13.90004	14.14322	13.41988	14.14322	13.41988	18.554943	17.5684	18.55494	17.3236	18.74953	17.79341
383096.9	3735428	69.67%	13.491362	12.82114	13.49136	12.82114	13.68131	12.99956	14.42507	13.70702	13.91001	13.23552	13.91001	13.23552	18.252662	17.36966	18.25266	17.28626	18.44261	17.54945
383138.9	3735450	69.84%	13.346451	12.7325	13.34645	12.7325	13.53304	12.90792	14.26909	13.61112	13.77752	13.14424	13.77752	13.14424	18.081349	17.2502	18.08135	17.1403	18.26893	17.42789
383180.9	3735472	70.39%	13.239626	12.55327	13.23963	12.55327	13.4236	12.72424	14.15409	13.41812	13.6672	12.95899	13.6672	12.95899	17.937524	17.00911	17.93752	16.90421	18.12293	17.18333
383222.9	3735494	71.13%	13.103121	12.29712	13.10312	12.29712	13.28408	12.46234	14.00739	13.14257	13.52623	12.6939	13.52623	12.6939	17.75336	16.66483	17.75336	16.66483	17.93639	16.83427
383264.9	3735517	71.95%	12.958792	12.09576	12.95879	12.09576	13.13656	12.25601	13.85223	12.9257	13.37696	12.48559	13.37696	12.48559	17.559162	16.39441	17.55916	16.39441	17.73943	16.55976
383306.9	3735539	71.68%	12.827258	11.94171	12.82726	11.94171	13.00199	12.09807	13.71068	12.75971	13.2408	12.3262	13.2408	12.3262	17.382517	16.18744	17.38252	16.18744	17.56034	16.34981
383348.9	3735561	71.58%	12.703511	11.81689	12.70351	11.80016	12.87514	11.95299	13.57738	12.60723	13.11286	12.17976	13.11286	12.17976	17.216149	15.99738	17.21615	15.99738	17.39152	16.15685
383390.9	3735583	71.52%	12.578969	11.66079	12.57897	11.66079	12.74748	11.80991	13.44324	12.45696	12.9841	12.03571	12.9841	12.03571	17.048651	15.81009	17.04865	15.81009	17.22158	15.96666
383432.9	3735605	71.56%	12.465291	11.52196	12.46529	11.52196	12.63065	11.66755	13.32064	12.30739	12.86675	11.89212	12.86675	11.89212	16.895697	15.62358	16.8957	15.62358	17.06621	15.77738
383474.9	3735628	71.63%	12.381063	11.39402	12.38106	11.39402	12.54358	11.53616	13.2295	12.16939	12.77994	11.75979	12.77994	11.75979	16.782268	15.45183	16.78227	15.45183	16.95081	15.60297
383516.9	3735650	71.79%	12.241707	11.32553	12.24171	11.32553	12.40079	11.46633	13.07949	12.09586	12.63602	11.68893	12.63602	11.68893	16.59452	15.35951	16.59452	15.35951	16.76043	15.50954
383558.9	3735672	71.49%	12.118895	11.23678	12.1189	11.23678	12.27489	11.3749	12.94719	12.00775	12.50901	11.59741	12.50901	11.59741	16.429569	15.24003	16.42957	15.24003	16.59301	15.38808
383600.9	3735694	70.93%	11.987132	11.10024	11.98713	11.10024	12.14005	11.23448	12.80534	11.86155	12.37257	11.45638	12.37257	11.45638	16.252663	15.05644	16.25266	15.05644	16.41353	15.20156
383642.9	3735716	70.26%	11.897103	10.97463	11.8971	10.96548	12.04714	11.09607	12.70804	11.71721	12.27979	11.31708	12.27979	11.31708	16.131432	14.87539	16.13143	14.87539	16.29025	15.01773
383741.9	3735620	68.95%	11.622698	10.78673	11.6227	10.78673	11.76322	10.91183	12.41088	11.51412	11.99672	11.13225	11.99672	11.13225	15.762808	14.63577	15.76281	14.63577	15.91496	14.77411
383785.6	3735644	69.54%	11.507863	10.70404	11.50786	10.70404	11.6455	10.8271	12.28717	11.42507	11.87796	11.04674	11.87796	11.04674	15.608424	14.5246	15.60842	14.5246	15.75842	14.66131
383722.6	3735678	69.74%	11.711363	10.8544	11.71136	10.8544	11.85542	10.98236	12.50723	11.58772	12.08827	11.20199	12.08827	11.20199	15.881472	14.72648	15.88147	14.72648	16.03605	14.86668
383829.2	3735669	69.67%	11.384737	10.58937	11.38474	10.58937	11.51953	10.71039	12.15464	11.30197	11.75046	10.92767	11.75046	10.92767	15.443181	14.371	15.44318	14.371	15.5908	14.50575
383785	3735704	68.44%	11.558229	10.76841	11.55823	10.76841	11.69806	10.89411	12.342	11.49503	11.9299	11.11308	11.9299	11.11308	15.6758	14.61094	15.6758	14.61094	15.82715	14.74939
383736.7	3735726	67.96%	11.699659	10.83825	11.69966	10.66792	11.84355	10.7912	12.49469	11.57558	12.07611	11.00896	12.07611	11.00896	15.865771	14.47627	15.86577	14.47627	16.02021	14.61271
383759.7	3735538	63.89%	11.401733	10.76861	11.40173	10.69336	11.53509	10.81492	12.17178	11.41279	11.76831	11.0359	11.76831	11.0359	15.466603	14.51061	15.4666	14.51061	15.61366	14.62262
383722.8	3735508	62.53%	11.458763	10.85918	11.45876	10.85918	11.59354	10.98437	12.23317	11.59118	11.82716	11.20778	11.82716	11.20778	15.54351	14.73297	15.54351	14.73297	15.69167	14.85137
383788.9	3735500	68.82%	11.201037	10.85271	11.20104	10.85271	11.32833	10.97804	11.9549	11.58436	11.56081	11.20093	11.56081	11.20093	15.197409	14.72437	15.19741	14.72437	15.33994	14.8634
383816.4	3735565	68.48%	11.254279	10.62804	11.25428	10.62804	11.38398	10.74824	12.01296	11.3426	11.61579	10.93845	11.61579	10.93845	15.268456	14.38414	15.26846	14.38414	15.41264	14.51828
383748.2	3735465	68.69%	11.252886	10.99471	11.25289	10.99471	11.38132	11.12301	12.01063	11.73705	11.61436	11.34815	11.61436	11.34815	15.267362	14.91482	15.26736	14.91482	15.41087	15.05645

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	*2026_ALT1_CAAQS*	*2026_ALT1_NAAQS*	*2026_NP_CAAQS*	*2026_NP_NAAQS*	*2026_ALT3_CAAQS*	*2026_ALT3_NAAQS*	*2026_ALT4_CAAQS*	*2026_ALT4_NAAQS*	*2026_ALT5_CAAQS*	*2026_ALT5_NAAQS*	*2026_PP_CAAQS*	*2026_PP_NAAQS*	*2033_ALT1_CAAQS*	*2033_ALT1_NAAQS*	*2033_NP_CAAQS*	*2033_NP_NAAQS*	*2033_ALT3_CAAQS*	*2033_ALT3_NAAQS*
383816.1	3735459	69.86%	11.132521	10.82405	11.13252	10.82405	11.25734	10.9206	11.88061	11.55306	11.49008	11.13396	11.49008	11.13396	15.105573	14.63698	15.10557	14.63698	15.24641	14.77433
383850.5	3735504	67.87%	11.09728	10.78366	11.09188	10.78016	11.15558	10.87143	11.77338	11.50636	11.38657	11.09298	11.38657	11.09298	14.971366	14.58447	14.97137	14.58447	15.1105	14.72152
383864.2	3735555	68.45%	11.060551	10.65682	11.06055	10.60786	11.18517	10.72815	11.80406	11.32116	11.41527	10.91712	11.41527	10.91712	15.00866	14.35707	15.00866	14.35707	15.14878	14.49104
383857.3	3735611	68.50%	11.191791	10.56808	11.19179	10.52152	11.32075	10.64017	11.94611	11.22844	11.55091	10.85759	11.55091	10.85759	15.18454	14.28003	15.18454	14.28003	15.32781	14.41312
383773.5	3735422	68.08%	11.263319	10.84794	11.26332	10.84694	11.39123	10.93855	12.0214	11.57749	11.62538	11.16248	11.62538	11.16248	15.2814	14.67429	15.2814	14.67429	15.4247	14.81205
383673	3735451	62.71%	11.468713	11.12297	11.46871	11.12297	11.60377	11.25451	12.24378	11.87523	11.83704	11.48081	11.83704	11.48081	15.557751	15.08711	15.55775	15.08711	15.70605	15.2163
383642.4	3735417	63.61%	11.48236	11.19333	11.48236	11.19333	11.6176	11.32661	12.25832	11.95099	11.85104	11.55352	11.85104	11.55352	15.576433	15.1817	15.57643	15.1817	15.72487	15.31567
383611.7	3735384	67.33%	11.506187	11.17343	11.50619	11.17343	11.64147	11.30622	12.28366	11.92951	11.8758	11.53276	11.8758	11.53276	15.608613	15.15542	15.60861	15.15542	15.75723	15.29452
383581.1	3735350	67.12%	11.611333	11.1466	11.61133	11.1466	11.74903	11.27873	12.39679	11.90054	11.98459	11.50479	11.98459	11.50479	15.749876	15.11982	15.74988	15.11982	15.90051	15.26143
383550.4	3735317	66.41%	11.700224	11.13622	11.70022	11.13622	11.84005	11.26761	12.49246	11.88906	12.07646	11.49414	12.07646	11.49414	15.869562	15.10603	15.86956	15.10603	16.02184	15.25005
383709.9	3735417	68.89%	11.331197	10.98141	11.3312	10.98141	11.46154	11.10865	12.09489	11.72228	11.69518	11.33454	11.69518	11.33454	15.373054	14.89709	15.37305	14.89709	15.51807	15.03812
383679.2	3735383	69.10%	11.420252	10.98945	11.42025	10.98945	11.55309	11.1166	12.19091	11.73074	11.78702	11.34285	11.78702	11.34285	15.493104	14.90806	15.4931	14.90806	15.63992	15.0491
383648.6	3735350	68.51%	11.513095	11.00941	11.5131	10.98814	11.64808	11.11513	12.29081	11.72921	11.88305	11.3414	11.88305	11.3414	15.617898	14.90659	15.6179	14.90659	15.76651	15.04753
383617.9	3735316	68.07%	11.600604	11.00417	11.6006	10.99756	11.73735	11.12489	12.38484	11.74649	11.97369	11.35095	11.97369	11.35095	15.735546	14.91963	15.73555	14.91963	15.88562	15.06076
383587.2	3735283	67.74%	11.668794	11.00453	11.66879	10.99789	11.80692	11.12499	12.45807	11.74571	12.04422	11.35108	12.04422	11.35108	15.827256	14.92064	15.82726	14.92064	15.97864	15.06162
383746.7	3735383	70.66%	11.354893	10.86159	11.35489	10.86159	11.48494	10.98058	12.11992	11.59281	11.72005	11.17874	11.72005	11.17874	15.404665	14.69488	15.40467	14.69488	15.54974	14.8326
383716.1	3735349	72.23%	11.422514	10.88685	11.42251	10.88685	11.55433	11.00805	12.19277	11.61977	11.78981	11.21003	11.78981	11.21003	15.495831	14.73543	15.49583	14.73543	15.64227	14.87358
383685.4	3735316	72.88%	11.471115	10.92072	11.47112	10.92072	11.60439	11.02387	12.24519	11.6561	11.83979	11.20774	11.83979	11.20774	15.561581	14.73269	15.56158	14.73269	15.70912	14.87065
383654.7	3735283	73.13%	11.531626	10.94033	11.53163	10.94033	11.66599	11.05292	12.31012	11.67711	11.90245	11.24262	11.90245	11.24262	15.642981	14.77849	15.64298	14.77849	15.79147	14.91706
383624.1	3735249	73.33%	11.592489	10.93671	11.59249	10.93671	11.72761	11.06119	12.37519	11.6729	11.96548	11.27995	11.96548	11.27995	15.725085	14.82835	15.72509	14.82835	15.87444	14.96748
383491.1	3735284	65.21%	11.798031	11.20671	11.79803	11.20671	11.9409	11.3375	12.5981	11.9647	12.17716	11.56481	12.17716	11.56481	16.001565	15.20132	16.00157	15.19811	16.15609	15.34249
383446.4	3735262	64.48%	11.879724	11.27211	11.87972	11.27211	12.02467	11.40573	12.68607	12.03493	12.26152	11.63289	12.26152	11.63289	16.111619	15.28944	16.11162	15.28944	16.26775	15.43328
383401.7	3735240	64.41%	11.97471	11.32654	11.97471	11.32654	12.12151	11.46173	12.78806	12.09334	12.35982	11.68993	12.35982	11.68993	16.239461	15.36303	16.23946	15.36303	16.39723	15.50853
383357.1	3735217	63.47%	12.055753	11.39479	12.05575	11.39479	12.20409	11.52062	12.875	12.15527	12.44353	11.75018	12.44353	11.75018	16.348811	15.44165	16.34881	15.44165	16.50792	15.58356
383312.4	3735195	62.83%	12.135689	11.55717	12.13569	11.55717	12.28503	11.69405	12.96042	12.33804	12.52619	11.92628	12.52619	11.92628	16.45697	15.67116	16.45697	15.67116	16.6171	15.80987
383267.7	3735173	62.07%	12.206747	11.76771	12.20675	11.76771	12.35714	11.89955	13.03639	12.5544	12.59944	12.13497	12.59944	12.13497	16.553372	15.94277	16.55337	15.94277	16.71456	16.07897
383223.1	3735151	61.57%	12.442341	11.96553	12.44234	11.9414	12.59795	12.08844	13.28966	12.75312	12.84291	12.32609	12.84291	12.32609	16.870841	16.19254	16.87084	16.19254	17.03627	16.32841
383178.4	3735129	57.14%	12.695371	12.11609	12.69537	12.11111	12.85572	12.26165	13.56121	12.93533	13.10378	12.50071	13.10378	12.50071	17.211357	16.42169	17.21136	16.42169	17.37965	16.55943
383133.7	3735107	52.31%	12.902066	12.2176	12.90207	12.2176	13.06494	12.37081	13.78304	13.04991	13.3164	12.59772	13.3164	12.59772	17.489975	16.56613	17.48998	16.55442	17.66009	16.70951
383089.1	3735085	52.36%	13.021427	12.31454	13.02143	12.31454	13.18619	12.45872	13.91144	13.15431	13.43922	12.69816	13.43922	12.69816	17.651005	16.67945	17.65101	16.67945	17.82276	16.83885
383044.4	3735063	49.55%	13.073943	12.44482	13.07394	12.44482	13.24094	12.54241	13.96839	13.28218	13.49326	12.78355	13.49326	12.78355	17.718348	16.78878	17.71835	16.85288	17.89536	16.95529
383513.3	3735239	67.91%	11.788327	11.11505	11.78833	11.11505	11.92953	11.24447	12.58675	11.86525	12.16739	11.47214	12.16739	11.47214	15.98884	15.07869	15.98884	15.07869	16.14251	15.2217
383468.6	3735217	67.61%	11.857205	11.2127	11.85721	11.2127	12.00009	11.34391	12.66084	11.97001	12.23837	11.57318	12.23837	11.57318	16.081918	15.21023	16.08192	15.21023	16.23692	15.35486
383423.9	3735195	67.14%	11.943519	11.37367	11.94352	11.37367	12.08781	11.50828	12.75334	12.14298	12.32774	11.73961	12.32774	11.73961	16.198257	15.42706	16.19826	15.42706	16.35452	15.57453
383379.3	3735173	66.81%	12.008844	11.49095	12.00884	11.49095	12.15414	11.62814	12.82324	12.26895	12.39517	11.86051	12.39517	11.86051	16.286651	15.58571	16.28665	15.58571	16.44395	15.73523
383334.6	3735150	66.30%	12.12727	11.60152	12.12727	11.60152	12.27478	11.74025	12.9503	12.38724	12.51764	11.96922	12.51764	11.96922	16.446275	15.72753	16.44628	15.72753	16.60555	15.8786
383289.9	3735128	67.27%	12.230966	11.7505	12.23097	11.7505	12.38039	11.87687	13.06147	12.5311	12.62469	12.11355	12.62469	12.11355	16.586443	15.91591	16.58644	15.91591	16.74741	16.06931
383245.2	3735106	64.33%	12.385637	11.93412	12.38564	11.93412	12.53815	12.02357	13.22749	12.68553	12.78442	12.2622	12.78442	12.2622	16.795293	16.11044	16.79529	16.11044	16.9589	16.26619
383200.6	3735084	57.35%	12.583836	12.01987	12.58384	11.99945	12.7401	12.14575	13.4402	12.81409	12.98949	12.38585	12.98949	12.38585	17.062201	16.27249	17.0622	16.27249	17.22917	16.43026
383155.9	3735062	53.09%	12.755798	12.13598	12.7558	12.12921	12.91527	12.27896	13.62472	12.9538	13.16736	12.51944	13.16736	12.51944	17.29394	16.44803	17.29394	16.44803	17.46013	16.58993
383111.2	3735040	54.32%	12.86313	12.27078	12.86313	12.27078	13.02509	12.42427	13.74012	13.10633	13.27814	12.66543	13.27814	12.66543	17.438692	16.63891	17.43869	16.63891	17.60641	16.78468
383066.6	3735018	48.63%	12.913341	12.4017	12.91334	12.4017	13.07465	12.46517	13.79453	13.23557	13.32702	12.70664	13.32702	12.70664	17.502566	16.68967	17.50668	16.69047	17.67578	16.85412
383580.1	3735216	71.44%	11.666104	11.08532	11.6661	11.02288	11.80239	11.10995	12.454	11.83265	12.04153	11.33772	12.04153	11.33772	15.824661	14.90417	15.82466	14.90417	15.97508	15.04405
383535.4	3735194	70.56%	11.72669	11.21005	11.72669	11.14072	11.86447	11.26904	12.51916	11.94827	12.10391	11.49889	12.10391	11.49889	15.906654	15.11385	15.90665	15.11385	16.05818	15.25654
383490.8	3735172	69.50%	11.819826	11.31243	11.81983	11.31243	11.95994	11.44461	12.61937	12.0764	12.19986	11.67626	12.19986	11.67626	16.032566	15.34528	16.03257	15.34528	16.18593	15.4911
383446.1	3735150	68.13%	11.945842	11.42261	11.94584	11.42261	12.08838	11.55687	12.75468	12.1946	12.33033	11.79019	12.33033	11.79019	16.202049	15.49388	16.20205	15.49388	16.3576	15.64158
383401.4	3735128	67.69%	12.063995	11.52021	12.064	11.52021	12.20869	11.65643	12.88138	12.29929	12.45245	11.8907	12.45245	11.8907	16.361448	15.62624	16.36145	15.62624	16.51896	15.77548
383356.8	3735106	66.74%	12.15806	11.61543	12.15806	11.61543	12.30457	11.75269	12.98231	12.40101	12.54961	11.98938	12.54961	11.98938	16.488483	15.75451	16.48848	15.75451	16.64761	15.90511
383312.1	3735084	65.76%	12.236918	11.70798	12.23692	11.70798	12.38482	11.84692	13.0668	12.50021	12.631	12.08491	12.631	12.08491	16.595191	15.87976	16.59519	15.87976	16.75552	16.03184
383267.4	3735061	63.00%	12.297334	11.87713	12.29733	11.87713	12.44613	12.01975	13.13138	12.68201	12.69323	12.24722	12.69323	12.24722	16.677339	16.09151	16.67734	16.09151	16.83843	16.24637
383222.8	3735039	60.17%	12.409312	12.03346	12.40931	12.03346	12.56014	12.07691	13.25149	12.74219	12.80903	12.3176	12.80903	12.3176	16.82831	16.1841	16.82831	16.1841	16.9913	16.34002
383178.1	3735017	54.56%	12.540042	12.1548	12.54004	12.07491	12.69341	12.2223	13.39186	12.89472	12.94436	12.46353	12.94436	12.46353	17.004176	16.37513	17.00418	16.37513	17.16932	16.53392
383133.4	3734995	56.58%	12.631857	12.26631	12.63186	12.26631	12.78744	12.41906	13.49067	13.10117	13.0392	12.66112	13.0392	12.66112	17.127866	16.63274	17.12787	16.63274	17.29133	16.77619
383088.8	3734973	48.59%	12.728368	12.39014	12.72837	12.38933	12.88456	12.3469	13.59483	13.22202	13.13629	12.57652	13.13629	12.57652	17.254377	16.53549	17.25804	16.52104	17.42354	16.68268
383116.6	3734898	53.69%	12.677719	12.22708	12.67772	12.22708	12.83487	12.30459	13.54086	13.06022	13.08637	12.54507	13.08637	12.54507	17.187141	16.47813	17.18808	16.47857	17.35567	16.63961
383135.3	3734857	54.81%	12.624784	12.22076	12.62478	12.22076	12.78175	12.29088	13.48433	13.05399	13.03265	12.5311	13.03265	12.5311	17.115727	16.4577	17.11573	16.45908	17.2835	16.61929
383154	3734816	55.20%	12.565825	12.14074	12.56583	12.14074	12.7218	12.29295	13.42127	12.96823	12.97207	12.53138	12.97207	12.53138	17.035351	16.434	17.03535	16.4585	17.20225	16.59307
383172.7	3734774	56.02%	12.516646	12.10196	12.51665	12.10196	12.67132	12.25331	13.36835	12.9266	12.92153	12.49317	12.92153	12.49317	16.968658	16.40588	16.96866	16.40588	17.13458	16.53046
383191.4	3734733	58.01%	12.495426	12.09166	12.49543	12.08242	12.64927	12.23297	13.34538	12.90541	12.89987	12.47322	12.89987	12.47322	16.939755	16.37917	16.93976	16.37917	17.10516	16.47442
383162.2	3734919	64.60%	12.525061	12.15151	12.52506	12.15151	12.67845	12.30139	13.37615	12.97759	12.92937	12.54265	12.92937	12.54265	16.982701	16.47783	16.9827	16.47783	17.14795	16.61459
383180.9	3734878	67.56%	12.467387	12.05814	12.46739	12.05814	12.61981	12.20597	13.31445	12.87728	12.8701	12.44633	12.8701	12.44633	16.904115	16.35174	16.90412	16.35165	17.06848	16.48376
383199.6	3734836	68.95%	12.429739	12.01553	12.42974	12.01553	12.5812	12.16229	13.27397	12.8315	12.83145	12.40265	12.83145	12.40265	16.852965	16.29369	16.85297	16.29369	17.01663	16.42693
383218.3	3734795	69.31%	12.406962	12.02152	12.40696	12.02152	12.55765	12.16827	13.24938	12.83796	12.80818	12.40924	12.80818	12.40924	16.821901	16.30103	16.8219	16.30103	16.98505	16.4364
383237	3734753	69.24%	12.385057	12.02923	12.38506	12.02923	12.53478	12.17578	13.22558	12.84611	12.78575	12.4176	12.78575	12.4176	16.792105	16.31079	16.79211	16.31079	16.95473	16.44848
383207.8	3734940	65.55%	12.36946	12.00631	12.36946	12.00631	12.51813	12.15121	13.20794	12.82041	12.76837	12.39294	12.76837	12.39294	16.774311	16.28264	16.77431	16.28264	16.93599	16.43977
383226.5	3734898	69.87%	12.347292	11.99707	12.34729	11.99707	12.49521	12.14113	13.18401	12.81013	12.74571	12.38367	12.74571	12.38367	16.744089	16.27001	16.74409	16.27001	16.90534	16.42675
383245.2	3734857	69.59%	12.326626	12.00182	12.32663	12.00182	12.47374	12.14549	13.16164	12.81498	12.72458	12.38886	12.72458	12.38886	16.715925	16.27616	16.71593	16.27616	16.87665	16.43278
383263.9	3734815	67.82%	12.305575	12.00965	12.30558	12.00965	12.45171	12.15296	13.13872	12.82313	12.70301	12.39723	12.70301	12.39723	16.687544	16.28643	16.68754	16.28643	16.84762	16.44305
383282.6	3734774	66.53%	12.278979	11.9912	12.27898	11.9912	12.42411	12.13371	13.10989	12.80311	12.67571	12.37844	12.67571	12.37844	16.651514	16.26127	16.65151	16.26127	16.81104	16.41729
383171.7	3734669	62.05%	12.583209	12.1982	12.58321	12.1982	12.73938	12.3406	13.44004	13.01892	12.99068	12.58295	12.99068	12.58295	17.05751	16.52086	17.05751	16.52086	17.22481	16.68354
383219.4	3734654	68.43%	12.4789	12.10897	12.4789	12.10897	12.6314	12.2586	13.32708	12.93285	12.88322	12.50038	12.88322	12.50038	16.917117	16.41654	16.91712	16.41654	17.08193	16.56237
383164.4	3734606	71.54%	12.656726	12.26399	12.65673	12.26399	12.81396	12.41691	13.51869	13.09943	13.06671	12.6607	13.06671	12.6607	17.15677	16.62521	17.15677	16.62521	17.32517	16.7885
383245.2	3734611	70.96%	12.444538	12.10291	12.44454	12.10291	12.59521	12.25156	13.28949	12.92586	12.84795	12.49001	12.84795	12.49001	16.870912	16.40826	16.87091	16.40826	17.03466	16.56267
383286.9	3734703	73.15%	12.295992	11.9964	12.29599	11.9964	12.44183	12.14016	13.12858	12.80956	12.69384	12.38409	12.69384	12.38409	16.673114	16.26693	16.67311	16.26693	16.83314	16.42367
383190.2	3734564	67.44%	12.63226	12.28048	12.63226	12.28048	12.78778	12.42978	13.49172	13.1166	13.04179	12.67532	13.04179	12.67532	17.123795	16.64695	17.1238	16.64695	17.29119	16.80628
383069.6	3734667	67.58%	12.961535	12.56335	12.97828	12.56335	13.12078	12.7174	13.84057	13.4154	13.3746	12.96427	13.3746	12.96427	17.559486	17.02156	17.55949	17.02156	17.73402	17.19025
383045.9	3734708	64.35%	13.063505	12.58134	13.06351	12.58134	13.20779	12.73018	13.93219	13.42893	13.46281	12.97736	13.46281	12.97736	17.675327	17.04075	17.67533	17.04075	17.85113	17.19429
383057.1	3734619	67.96%	13.038903	12.62888	13.0389	12.62888	13.20614	12.78985	13.93047	13.49171	13.46126	13.03789	13.46126	13.03789	17.671582	17.11659	17.67158	17.11659	17.84764	17.28662
383002.7	3734683	64.65%	13.363554	12.87345	13.36355	12.87345	13.53692	13.03919	14.27921	13.75406	13.77338	13.28738	13.77338	13.28738	18.079395	17.44395	18.0794	17.44751	18.26089	17.61795
383013.9	3734593	65.90%	13.300499	12.8295	13.3005	12.8295	13.47387	12.99461	14.21196	13.70723	13.73176	13.24541	13.73176	13.24541	18.023488	17.38672	18.02349	17.38672	18.20446	17.56024
383113.7	3734552	67.84%	12.867434	12.58192	12.89041	12.58192	13.02947	12.73405	13.74506	13.4333	13.28375	12.98235	13.28375	12.98235	17.439787	17.04226	17.43979	17.04226	17.61225	17.21121
382959.5	3734657	62.77%	13.625099	13.03482	13.6251	13.03482	13.80584	13.20402	14.56102	13.92752	14.06712	13.45719	14.06712	13.45719	18.460882	17.66443	18.46088	17.66443	18.64788	17.82448
382935.8	3734698	63.69%	13.690128	13.03502	13.69013	13.03502	13.87335	13.20493	14.6316	13.92812	14.13414	13.45712	14.13414	13.45712	18.54828	17.66488	18.54828	17.66488	18.73698	17.82659
383126.3	3734636	69.55%	12.748798	12.42932	12.7488	12.42932	12.90943	12.58677	13.61845	13.27775	13.16137	12.83149	13.16137	12.83149	17.281021	16.84759	17.28102	16.84759	17.45161	17.00206
382881.5	3734689	65.55%	13.932441	13.20984	13.93244	13.20984	14.12323	13.38536	14.8936	14.11726	14.38466	13.63792	14.38466	13.63792	18.873099	17.89913	18.8731	17.89913	19.06732	18.06366
382864.9	3734641	64.88%	14.07883	13.34478	14.07883	13.34478	14.27299	13.52397	15.05111	14.26283	14.53633	13.77746	14.53633	13.77746	19.069341	18.08025	19.06934	18.08025	19.26639	18.26445
382929.6	3734619	64.29%	13.820364	13.16777	13.82036	13.16777	14.00625	13.34022	14.77151	14.07073	14.26912	13.59407	14.26912	13.59407	18.722994	17.84287	18.72299	17.84287	18.91406	18.0215

Reduction to Peak Concentration due to Inclusion of T3 OGVs (ppm):			0.0004	0.0003	0.0003	0.0003	0.0010	0.0010	0.0003	0.0003	0.0007	0.0007	0.0007	0.0007	0.0014	0.0013	0.0014	0.0013	0.0040	0.0038
Percent Reduction Due to Inclusion of Tier 3 OGV:			15.74%	15.74%	15.74%	15.74%	17.02%	17.02%	16.12%	16.12%	11.96%	11.96%	11.96%	11.96%	52.47%	52.47%	52.47%	52.47%	48.91%	48.91%
Peak Receptor (X_Y):			389450_3733350	389450_3733350	389450_3739850	389950_3733350	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration Lookup with Source Scaling:			4.2472254	4.10954	3.661651	3.757488	11.39078	10.72226	3.888468	3.791413	11.57337	10.89777	11.57337	10.89777	4.9959028	4.510162	4.995903	4.510162	15.37303	14.53516
X	Y	Source Scaling Factor	*2026_ALT1_CAAQS*	*2026_ALT1_NAAQS*	*2026_NP_CAAQS*	*2026_NP_NAAQS*	*2026_ALT3_CAAQS*	*2026_ALT3_NAAQS*	*2026_ALT4_CAAQS*	*2026_ALT4_NAAQS*	*2026_ALT5_CAAQS*	*2026_ALT5_NAAQS*	*2026_PP_CAAQS*	*2026_PP_NAAQS*	*2033_ALT1_CAAQS*	*2033_ALT1_NAAQS*	*2033_NP_CAAQS*	*2033_NP_NAAQS*	*2033_ALT3_CAAQS*	*2033_ALT3_NAAQS*
382820.5	3734619	62.11%	14.303046	13.51818	14.30305	13.51818	14.50377	13.70282	15.29331	14.45031	14.76821	13.95657	14.76821	13.95657	19.370358	18.313	19.37036	18.313	19.57227	18.45237
382913	3734572	62.70%	13.973687	13.32114	13.97369	13.32114	14.16297	13.49029	14.93642	14.22844	14.42783	13.74622	14.42783	13.74622	18.928922	18.03991	18.92892	18.04909	19.12277	18.22234
382765.6	3734635	60.47%	14.540338	13.7643	14.54034	13.7643	14.74809	13.95583	15.54951	14.71583	15.01295	14.21072	15.01295	14.21072	19.689675	18.64411	19.68968	18.64411	19.89681	18.83737
382746.9	3734571	60.70%	14.690083	13.87519	14.69008	13.87519	14.90216	14.06907	15.71109	14.83504	15.16761	14.32572	15.16761	14.32572	19.8911	18.79287	19.8911	18.79287	20.10134	18.98816
382847.7	3734563	61.86%	14.294273	13.53401	14.29427	13.53401	14.49299	13.71715	15.28272	14.46615	14.75927	13.97319	14.75927	13.97319	19.359	18.33491	19.359	18.33491	19.55995	18.39391
382768.1	3734526	59.69%	14.654597	13.87318	14.6546	13.87318	14.86509	14.06649	15.67248	14.83266	15.13127	14.32386	15.13127	14.32386	19.843087	18.78985	19.84309	18.78985	20.05236	18.98503
382784.2	3734476	60.66%	14.659691	13.88948	14.65969	13.88948	14.86941	14.08186	15.67742	14.8495	15.13669	14.34074	15.13669	14.34074	19.849983	18.81201	19.84998	18.81201	20.05902	19.00652
382802.4	3734430	61.33%	14.627075	13.83199	14.62708	13.83248	14.8355	14.02254	15.64212	14.78771	15.10329	14.24474	15.10329	14.24474	19.805959	18.73464	19.80596	18.73539	20.0141	18.87201
382820.6	3734384	59.32%	14.56006	13.72056	14.56006	13.76368	14.76658	13.90854	15.56982	14.7138	15.03432	14.16669	15.03432	14.16669	19.71519	18.58439	19.71519	18.64242	19.92209	18.77587
382838.8	3734337	59.13%	14.490168	13.67225	14.49017	13.75697	14.69468	13.831	15.49441	14.70678	14.96227	14.08726	14.96227	14.08726	19.621047	18.48433	19.62105	18.6329	19.82642	18.67174
382857	3734291	58.37%	14.443646	13.64235	14.44365	13.68649	14.64628	13.82867	15.44392	14.63047	14.91445	14.08575	14.91445	14.08575	19.558574	18.47909	19.55857	18.53817	19.76262	18.66916
382830.7	3734495	56.52%	14.476617	13.58409	14.47662	13.63819	14.67906	13.7674	15.47897	14.57785	14.94745	14.02467	14.94745	14.02467	19.604442	18.403	19.60444	18.4755	19.80805	18.59072
382848.9	3734448	56.32%	14.428139	13.58384	14.42814	13.63256	14.6294	13.76686	15.42658	14.57162	14.898	14.02483	14.898	14.02483	19.538783	18.40203	19.53878	18.46743	19.742	18.58979
382867.1	3734402	56.52%	14.347841	13.57529	14.34784	13.57529	14.54727	13.75773	15.34021	14.51023	14.81552	13.96893	14.81552	13.96893	19.430038	18.38969	19.43004	18.38969	19.63182	18.51497
382885.3	3734356	61.11%	14.261639	13.55167	14.26164	13.55167	14.45876	13.73301	15.24732	14.48514	14.72649	13.9903	14.72649	13.9903	19.31356	18.35713	19.31356	18.35713	19.51373	18.54216
382903.5	3734309	62.12%	14.208071	13.5597	14.20807	13.5597	14.40324	13.74268	15.18927	14.49361	14.67141	14.00078	14.67141	14.00078	19.241633	18.3678	19.24163	18.3678	19.44039	18.55432
382877.3	3734513	57.66%	14.24328	13.46551	14.24328	13.46551	14.43835	13.57149	15.22683	14.39127	14.70609	13.82827	14.70609	13.82827	19.291004	18.24354	19.291	18.24354	19.4889	18.33105
382895.5	3734467	58.55%	14.178487	13.46763	14.17849	13.46763	14.37241	13.64737	15.15707	14.39368	14.64009	13.90495	14.64009	13.90495	19.203301	18.24559	19.2033	18.24559	19.40086	18.43087
382913.7	3734420	60.96%	14.082387	13.44781	14.08239	13.44781	14.27428	13.6276	15.05374	14.37281	14.54118	13.88502	14.54118	13.88502	19.073093	18.21773	19.07309	18.21773	19.26928	18.4032
382931.9	3734374	64.03%	13.994733	13.35512	13.99473	13.35512	14.18435	13.53264	14.95939	14.27307	14.45088	13.78945	14.45088	13.78945	18.954826	18.09257	18.95483	18.09257	19.14921	18.27624
382950.1	3734328	64.49%	13.950584	13.34351	13.95058	13.34351	14.13816	13.51987	14.91122	14.25998	14.40538	13.77764	14.40538	13.77764	18.895524	18.07709	18.89552	18.07709	19.0887	18.26012
382871.9	3734241	58.63%	14.450634	13.71164	14.45063	13.74365	14.65227	13.89641	15.45072	14.69125	14.92177	14.02942	14.92177	14.02942	19.56835	18.57257	19.56835	18.61501	19.77203	18.59409
382885.3	3734196	62.19%	14.443379	13.78467	14.44338	13.78467	14.64376	13.97145	15.44218	14.73494	14.91428	14.23414	14.91428	14.23414	19.55898	18.66985	19.55898	18.66985	19.76196	18.81944
382919.8	3734255	60.94%	14.275601	13.66412	14.2756	13.66412	14.46993	13.84669	15.26038	14.60413	14.74136	14.1092	14.74136	14.1092	19.33347	18.5091	19.33347	18.5091	19.53241	18.69761
382933.3	3734210	63.49%	14.240038	13.66807	14.24004	13.66807	14.43286	13.85007	15.22172	14.608	14.7048	14.11339	14.7048	14.11339	19.285871	18.51355	19.28587	18.51392	19.48383	18.70209
382967.8	3734270	61.16%	14.133719	13.55807	14.13372	13.55807	14.32041	13.73396	15.10472	14.48717	14.59465	13.99962	14.59465	13.99962	19.145455	18.36892	19.14546	18.36892	19.33951	18.55339
382981.2	3734224	62.78%	14.108781	13.56125	14.10878	13.56125	14.29393	13.73628	15.07734	14.49008	14.56912	13.99993	14.56912	13.99993	19.112032	18.37313	19.11203	18.37313	19.30517	18.55231
382876.7	3734151	68.55%	14.556834	13.85364	14.55683	13.85364	14.75939	14.03994	15.56404	14.80912	15.03175	14.29667	15.03175	14.29667	19.711582	18.7625	19.71158	18.7625	19.91653	18.95537
382827.3	3734088	68.06%	14.910171	13.99984	14.91177	14.01898	15.12104	14.16629	15.94645	14.98768	15.39654	14.41417	15.39654	14.41417	20.188286	18.98341	20.18829	18.9846	20.39809	19.15268
382925.8	3734141	62.65%	14.295096	13.74291	14.2951	13.74291	14.48987	13.92745	15.28138	14.68931	14.76158	14.1915	14.76158	14.1915	19.359899	18.61324	19.3599	18.61324	19.55914	18.80353
382891.4	3734088	64.12%	14.558739	13.87028	14.55874	13.87135	14.76	14.05825	15.56522	14.82774	15.03407	14.30411	15.03407	14.30411	19.714389	18.78449	19.71439	18.78612	19.91888	18.97745
382842	3734025	64.04%	14.959963	14.09636	14.95996	14.09649	15.17057	14.29002	15.99705	15.07019	15.44921	14.5567	15.44921	14.5567	20.253668	19.08871	20.25367	19.0889	20.46577	19.2861
382970	3734121	64.71%	14.121432	13.61063	14.12143	13.61235	14.3093	13.79016	15.09276	14.54745	14.58247	14.05497	14.58247	14.05497	19.126808	18.43598	19.12681	18.43858	19.32153	18.62283
382930.7	3734057	64.27%	14.348247	13.79672	14.34825	13.79762	14.54336	13.98182	15.33786	14.74775	14.81642	14.24757	14.81642	14.24757	19.431876	18.68512	19.43188	18.68649	19.63171	18.87611
382881.3	3733995	63.89%	14.752211	13.98639	14.75221	13.98833	14.95678	14.17638	15.77262	14.9531	15.23448	14.44348	15.23448	14.44348	19.97477	18.94052	19.97477	18.94346	20.18235	19.13527
382783.6	3734041	62.79%	15.226007	14.27446	15.22601	14.2748	15.44234	14.44909	16.28488	15.26371	15.72096	14.70959	15.72096	14.70959	20.610387	19.32767	20.61039	19.32792	20.82866	19.52965
382704.1	3734006	67.80%	15.73352	14.86816	15.73352	14.87214	15.96584	15.08403	16.83182	15.90731	16.24889	15.35469	16.24889	15.35469	21.292387	20.12471	21.29239	20.13075	21.52098	20.3388
382624.7	3733971	66.64%	16.418913	15.59973	16.41891	15.59973	16.67003	15.83444	17.57098	16.69163	16.95714	16.11072	16.95714	16.11072	22.213762	21.10834	22.21376	21.10834	22.45661	21.33719
382545.2	3733935	59.95%	17.134846	16.26136	17.13485	16.26136	17.40616	16.51379	18.34356	17.4051	17.69673	16.79498	17.69673	16.79498	23.17618	21.99719	23.17618	21.99719	23.43423	22.23963
382804	3733996	64.27%	15.229269	14.30677	15.22927	14.30989	15.44659	14.50606	16.2871	15.30021	15.72777	14.77435	15.72777	14.77435	20.615408	19.37141	20.61541	19.37615	20.83287	19.5731
382724.5	3733960	65.71%	15.679308	14.81352	15.67931	14.81352	15.90956	15.02703	16.77291	15.84386	16.19296	15.29824	16.19296	15.29824	21.219497	20.0515	21.2195	20.0515	21.44665	20.2567
382645	3733925	67.23%	16.313941	15.49813	16.31394	15.49813	16.5616	15.72981	17.45745	16.58198	16.8487	16.00595	16.8487	16.00595	22.072816	20.97151	22.07282	20.97151	22.31323	21.19809
382565.5	3733890	58.39%	17.068558	16.17047	17.06856	16.17047	17.33697	16.41957	18.2713	17.30654	17.6283	16.70107	17.6283	16.70107	23.087284	21.87506	23.08728	21.87506	23.34351	22.1153
382824.3	3733950	65.39%	15.175143	14.22159	15.17514	14.22159	15.38996	14.41728	16.22807	15.20425	15.67202	14.67991	15.67202	14.67991	20.542943	19.25783	20.54294	19.25783	20.75881	19.4475
382744.8	3733915	64.49%	15.678731	14.79568	15.67873	14.79568	15.90693	15.00681	16.77108	15.82337	16.19267	15.27987	16.19267	15.27987	21.219379	20.02866	21.21938	20.02866	21.44561	20.23991
382665.3	3733879	62.49%	16.179398	15.35072	16.1794	15.35072	16.42319	15.57853	17.31224	16.42316	16.70972	15.85388	16.70972	15.85388	21.891968	20.77291	21.89197	20.77291	22.12953	20.99654
382585.8	3733844	59.94%	16.928913	16.04823	16.92891	16.04823	17.19348	16.29418	18.1207	17.17491	17.48414	16.57501	17.48414	16.57501	22.899714	21.71018	22.89971	21.71018	23.1529	21.94796
382461.5	3733897	54.38%	17.837715	16.92621	17.83772	16.92621	18.12879	17.19836	19.10208	18.12324	18.42334	17.48213	18.42334	17.48213	24.119803	22.8894	24.1198	22.8894	24.3929	23.14651
382417	3733877	57.23%	18.192912	17.3817	18.19291	17.3817	18.49419	17.66698	19.48549	18.61508	18.7904	17.95318	18.7904	17.95318	24.596807	23.50054	24.59681	23.50054	24.87758	23.7676
382372.5	3733856	58.19%	18.636283	18.06271	18.63628	18.06271	18.95006	18.36698	19.964	19.34996	19.24875	18.65741	19.24875	18.65741	25.19241	24.41471	25.19241	24.41471	25.48247	24.69622
382328	3733836	58.98%	19.125204	18.73834	19.1252	18.73834	19.45259	19.06102	20.49145	20.07887	19.75406	19.35624	19.75406	19.35624	25.84899	25.32128	25.84899	25.32128	26.1495	25.61695
382283.4	3733815	60.21%	19.653621	19.11038	19.65362	19.11038	19.99577	19.44404	21.06162	20.48057	20.30033	19.74038	20.30033	19.74038	26.558949	25.8215	26.55895	25.8215	26.87054	26.12531
382238.9	3733794	61.88%	20.233484	19.61745	20.23348	19.61745	20.59148	19.9656	21.68708	21.02061	20.89969	20.26439	20.89969	20.26439	27.337598	26.50273	27.3376	26.50273	27.66143	26.81737
382194.4	3733774	63.14%	20.854635	19.96344	20.85464	19.95641	21.22907	20.32129	22.35688	21.39414	21.5422	20.62191	21.5422	20.62191	28.171469	26.96753	28.17147	26.95751	28.50806	27.28956
382482.5	3733852	55.30%	17.794203	16.78866	17.7942	16.78866	18.08293	17.05588	19.05434	17.97422	18.37852	17.34012	18.37852	17.34012	24.061647	22.70501	24.06165	22.70501	24.33325	22.95873
382438	3733831	58.76%	18.158718	17.24926	18.15872	17.24926	18.45792	17.52978	19.44782	18.4715	18.75516	17.81631	18.75516	17.81631	24.5513	23.3231	24.5513	23.3231	24.83076	23.58685
382393.5	3733811	59.60%	18.555623	17.91903	18.55562	17.91903	18.86596	18.21839	19.87614	19.19438	19.1655	18.50899	19.1655	18.50899	25.084306	24.22205	25.08431	24.22205	25.37217	24.50008
382349	3733790	60.08%	19.010758	18.596	19.01076	18.596	19.33417	18.91414	20.36753	19.92493	19.63589	19.20922	19.63589	19.20922	25.695601	25.13042	25.6956	25.13042	25.99327	25.42285
382304.4	3733770	60.71%	19.539683	19.07168	19.53968	19.07168	19.87774	19.40352	20.9381	20.43833	20.18254	19.70053	20.18254	19.70053	26.40612	25.76952	26.40612	25.76952	26.71498	26.07212
382259.9	3733749	61.69%	20.097577	19.55944	20.09758	19.55944	20.45109	19.9054	21.54009	20.95863	20.75938	20.20447	20.75938	20.20447	27.155536	26.42477	27.15554	26.42477	27.47612	26.73795
382215.4	3733728	61.49%	20.736866	19.77597	20.73687	19.77141	21.10733	20.12792	22.22942	21.19323	21.42069	20.42834	21.42069	20.42834	28.013645	26.7159	28.01365	26.70796	28.34751	27.03367
382503.5	3733807	59.99%	17.718599	16.72719	17.7186	16.72719	18.00436	16.99201	18.97235	17.9074	18.30057	17.27679	18.30057	17.27679	23.960407	22.62241	23.96041	22.62241	24.22999	22.87444
382459	3733786	57.50%	18.079978	17.11321	18.07998	17.11321	18.37623	17.38937	19.36241	18.32437	18.67393	17.6758	18.67393	17.6758	24.445673	23.14042	24.44567	23.14042	24.72319	23.40097
382414.5	3733765	58.22%	18.462699	17.75275	18.4627	17.75275	18.76957	18.04681	19.77534	19.01458	19.06953	18.33716	19.06953	18.33716	24.959712	23.99893	24.95971	23.99893	25.24525	24.27309
382369.9	3733745	58.93%	18.912636	18.46706	18.91264	18.46706	19.23218	18.78065	20.2609	19.78508	19.53465	19.07584	19.53465	19.07584	25.564237	24.9577	25.56424	24.9577	25.85931	25.24688
382325.4	3733724	57.57%	19.449427	19.05644	19.44943	19.05644	19.78382	19.38672	20.84003	20.42122	20.08945	19.68503	20.08945	19.68503	26.285292	25.74939	26.28529	25.74939	26.59166	26.05117
382280.9	3733704	57.49%	19.955049	19.4949	19.95505	19.4949	20.3039	19.83846	21.38578	20.89484	20.61204	20.13795	20.61204	20.13795	26.964452	26.3383	26.96445	26.3383	27.28169	26.64981
382236.4	3733683	57.91%	20.609014	19.74075	20.60901	19.74075	20.9752	20.09081	22.09098	21.15992	21.28861	20.39206	21.28861	20.39206	27.842278	26.66848	27.84228	26.66848	28.1731	26.98508
382173.9	3733684	61.77%	21.30009	20.66379	21.30009	20.66379	21.68585	21.03997	22.83699	22.15644	22.00332	21.34706	22.00332	21.34706	28.769392	27.90644	28.76939	27.90644	29.11504	28.24295
382096.2	3733669	61.09%	22.59737	21.63572	22.59737	21.63572	23.01804	22.03776	24.23607	23.20441	23.34496	22.35229	23.34496	22.35229	30.511137	29.21169	30.51114	29.21169	30.88373	29.56815
382183	3733635	60.61%	21.367685	20.6928	21.36769	20.6928	21.7542	21.06833	22.90916	22.18678	22.07321	21.37722	22.07321	21.37722	28.86077	27.9458	28.86077	27.9458	29.20728	28.28217
382105.4	3733620	61.67%	22.648433	21.59303	22.64843	21.59303	23.06969	21.99318	24.29061	23.15783	23.39786	22.30816	23.39786	22.30816	30.579997	29.15467	30.58	29.15467	30.95326	29.50991
382256.9	3733611	62.57%	20.419993	19.639	20.41999	19.639	20.78098	19.98672	21.88711	21.05072	21.09325	20.2875	21.09325	20.2875	27.587827	26.53038	27.58783	26.53038	27.91468	26.84517
382308.6	3733648	61.36%	19.760452	19.2424	19.76045	19.2424	20.10338	19.57856	21.17551	20.62225	20.41097	19.87699	20.41097	19.87699	26.703366	25.99901	26.70337	25.99901	27.0163	26.3051
382192.2	3733585	62.41%	21.338898	20.64798	21.3389	20.64798	21.72424	21.02189	22.87789	22.13821	22.04348	21.33106	22.04348	21.33106	28.822245	27.88549	28.82225	27.88549	29.16799	28.22089
382114.5	3733571	60.40%	22.655835	21.52248	22.65584	21.52248	23.07676	21.92026	24.29822	23.08149	23.40551	22.23529	23.40551	22.23529	30.590048	29.05997	30.59005	29.05997	30.96327	29.41361
382137.1	3733720	60.26%	21.692227	20.9625	21.69223	20.9625	22.0891	21.34685	23.26015	22.47861	22.40871	21.65578	22.40871	21.65578	29.295813	28.30776	29.29581	28.30776	29.64982	28.65044
382053.5	3733594	58.51%	23.675796	22.61573	23.66896	22.61506	24.11805	23.04277	25.39147	24.2602	24.45328	23.36526	24.45328	23.36526	31.950126	30.52644	31.95013	30.52644	32.34476	30.90308
382054.7	3733544	56.53%	23.831725	22.71433	23.82527	22.71424	24.28057	23.14459	25.55997	24.36715	24.61476	23.4678	24.61476	23.4678	32.16024	30.65966	32.16024	30.65966	32.55808	31.03827
382118.9	3733507	61.04%	22.801317	21.6065	22.80132	21.6065	23.22552	22.00595	24.45478	23.17178	23.55595	22.32231	23.55595	22.32231	30.785841	29.17289	30.78584	29.17289	31.16172	29.52791
382171.4	3733530	63.16%	21.753475	21.09645	21.75348	21.09645	22.14882	21.48156	23.32419	22.62131	22.47242	21.79502	22.47242	21.79502	29.379377	28.48783	29.37938	28.48783	29.73319	28.8321
382056	3733494	55.38%	24.017159	22.76627	24.01061	22.76627	24.47444	23.19753	25.75946	24.42281	24.80827	23.52132	24.80827	23.52132	32.409822	30.73036	32.40982	30.73036	32.81121	31.10981

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
380450	3731350	14.87532	14.37811	20.09364	19.41912	20.09364	19.41912	19.75864	19.09341	19.75864	19.09341	19.95483	19.28367	14.87532	14.37811	20.09364	19.41912	20.09364	19.41912
380950	3731350	16.60951	16.2649	22.38863	21.91812	22.38863	21.91812	22.00597	21.5419	22.00597	21.5419	22.24106	21.77405	16.60951	16.2649	22.38863	21.91812	22.38863	21.91812
381450	3731350	19.13417	18.37688	25.74233	24.72277	25.74233	24.72277	25.29541	24.29204	25.29541	24.29204	25.58336	24.56852	19.13417	18.37688	25.74233	24.72277	25.74233	24.72277
381950	3731350	22.65187	21.67879	30.43075	29.1248	30.43075	29.1248	29.89442	28.61028	29.89442	28.61028	30.2503	28.95024	22.65187	21.67879	30.43075	29.1248	30.43075	29.1248
384450	3731350	19.80805	18.75982	26.67677	25.27166	26.67677	25.27166	26.05794	24.67811	26.05794	24.67811	26.32074	24.92338	19.80805	18.75982	26.67677	25.27166	26.67677	25.27166
380450	3731850	16.27374	15.90703	21.95073	21.45031	21.95073	21.45031	21.58135	21.08731	21.58135	21.08731	21.80715	21.30982	16.27374	15.90703	21.95073	21.45031	21.95073	21.45031
380950	3731850	18.73023	18.24723	25.21601	24.56378	25.21601	24.56378	24.78331	24.14086	24.78331	24.14086	25.05963	24.41061	18.73023	18.24723	25.21601	24.56378	25.21601	24.56378
381450	3731850	20.69007	20.03885	27.80945	26.934	27.80945	26.934	27.32317	26.46291	27.32317	26.46291	27.64356	26.77328	20.69007	20.03885	27.80945	26.934	27.80945	26.934
383450	3731850	18.28304	17.94754	24.6264	24.17048	24.6264	24.17048	24.09342	23.64944	24.09342	23.64944	24.34078	23.89413	18.28304	17.94754	24.6264	24.17048	24.6264	24.17048
383950	3731850	16.715	16.29715	22.54531	21.97838	22.54531	21.97838	22.02116	21.46791	22.02116	21.46791	22.23017	21.67296	16.715	16.29715	22.54531	21.97838	22.54531	21.97838
380450	3732350	17.13588	16.29429	23.09106	21.96213	23.09106	21.96213	22.69802	21.58776	22.69802	21.58776	22.94341	21.81905	17.13588	16.29429	23.09106	21.96213	23.09106	21.96213
380950	3732350	19.25561	18.82113	25.90761	25.32405	25.90761	25.32405	25.45762	24.88463	25.45762	24.88463	25.7466	25.16686	19.25561	18.82113	25.90761	25.32405	25.90761	25.32405
381450	3732350	21.6446	21.1775	29.0794	28.44974	29.0794	28.44974	28.56743	27.94842	28.56743	27.94842	28.9069	28.28115	21.6446	21.1775	29.0794	28.44974	29.0794	28.44974
381950	3732350	24.40334	22.43998	32.75457	30.13294	32.75457	30.13294	32.16936	29.59191	32.16936	29.59191	32.56219	29.94767	24.40334	22.43998	32.75457	30.13294	32.75457	30.13294
382450	3732350	22.82196	22.49211	30.65461	30.16296	30.65461	30.16296	30.08175	29.59982	30.08175	29.59982	30.43678	29.95054	22.82196	22.49211	30.65461	30.16296	30.65461	30.16296
383450	3732350	16.05402	15.73552	21.6494	21.21393	21.6494	21.21393	21.17816	20.75322	21.17816	20.75322	21.38563	20.95888	16.05402	15.73552	21.6494	21.21393	21.6494	21.21393
383950	3732350	14.8691	14.49331	20.07462	19.55906	20.07462	19.55906	19.6132	19.11089	19.6132	19.11089	19.79289	19.28782	14.8691	14.49331	20.07462	19.55906	20.07462	19.55906
384450	3732350	13.98292	13.39435	18.89286	18.0773	18.89286	18.0773	18.45256	17.67125	18.45256	17.65226	18.61515	17.80745	13.98292	13.39435	18.89286	18.0773	18.89286	18.0773
380450	3732850	17.6814	17.11866	23.81172	23.05591	23.81172	23.05591	23.40336	22.6606	23.40336	22.6606	23.66134	22.90972	17.6814	17.11866	23.81172	23.05591	23.81172	23.05591
380950	3732850	20.16032	19.40287	27.11015	26.09657	27.11015	26.09657	26.63759	25.64117	26.63759	25.64117	26.94537	25.93547	20.16032	19.40287	27.11015	26.09657	27.11015	26.09657
381450	3732850	23.4469	22.46123	31.47855	29.96741	31.47855	29.96741	30.9246	29.43938	30.9246	29.43938	31.3005	29.79537	23.4469	22.46123	31.47855	29.96741	31.47855	29.96741
382450	3732850	20.22677	19.74786	27.19221	26.54586	27.19221	26.54586	26.67824	26.04378	26.67824	26.04378	26.98315	26.34254	20.22677	19.74786	27.19221	26.54586	27.19221	26.54586
383950	3732850	13.40089	12.98136	18.10745	17.53558	18.10745	17.53558	17.69876	17.13845	17.69876	17.13845	17.8563	17.2927	13.40089	12.98136	18.10745	17.53558	18.10745	17.53558
384450	3732850	12.71047	12.16577	17.18651	16.44775	17.18651	16.44775	16.79197	16.06884	16.79197	16.06884	16.9359	16.20722	12.71047	12.16577	17.18651	16.44775	17.18651	16.44775
384950	3732850	12.16621	11.75482	16.45952	15.89872	16.45952	15.89872	16.07951	15.52941	16.07951	15.52941	16.21364	15.66021	12.16621	11.75482	16.45952	15.89872	16.45952	15.89872
380450	3733350	17.99906	17.30547	24.23079	23.29921	24.23079	23.29921	23.81354	22.89752	23.81354	22.89752	24.07918	23.15204	17.99906	17.30547	24.23079	23.29921	24.23079	23.29921
380950	3733350	20.98385	20.58744	28.09835	27.58436	28.09835	27.58436	27.60856	27.10444	27.60856	27.10444	27.9329	27.42405	20.98385	20.58744	28.09835	27.58436	28.09835	27.58436
381450	3733350	24.6839	23.97323	33.11821	32.1616	33.11821	32.1616	32.53431	31.59408	32.53431	31.59408	32.93775	31.9869	24.6839	23.97323	33.11821	32.1616	33.11821	32.1616
382450	3733350	19.62223	18.92358	26.37938	25.43918	26.37938	25.43918	25.88172	24.95812	25.88172	24.95812	26.17782	25.24389	19.62223	18.92358	26.37938	25.43918	26.37938	25.43918
382950	3733350	15.41254	14.74289	20.77466	19.87072	20.77466	19.87072	20.35464	19.4676	20.35464	19.4676	20.56249	19.66673	15.41254	14.74289	20.77466	19.87072	20.77466	19.87072
383450	3733350	13.77123	12.95046	18.58997	17.48468	18.58997	17.48468	18.19481	17.10961	18.19481	17.10961	18.36716	17.27021	13.77123	12.95046	18.58997	17.48468	18.58997	17.48468
383950	3733350	12.53126	11.92438	16.93899	16.11793	16.93899	16.11793	16.56379	15.76046	16.56379	15.76046	16.7098	15.89959	12.53126	11.92438	16.93899	16.11793	16.93899	16.11793
389450	3733350	8.506633	8.231094	11.5497	11.17241	11.5497	11.17241	11.28143	10.91209	11.28143	10.91209	11.35971	10.98889	8.506633	8.231094	11.5497	11.17241	11.5497	11.17241
389950	3733350	8.093597	7.58754	10.99554	10.30913	10.99554	10.30913	10.74562	10.0783	10.74562	10.0783	10.81853	10.1468	8.093597	7.58754	10.99554	10.30913	10.99554	10.30913
380450	3733850	18.67643	18.01257	24.98789	24.2269	24.98789	24.2268	24.55779	23.81556	24.55779	23.81556	24.83715	24.08749	18.67643	18.01257	24.98789	24.2325	24.98789	24.2325
380950	3733850	22.30885	21.40768	29.96183	28.75316	29.96183	28.75316	29.43718	28.25085	29.43718	28.25085	29.79124	28.59012	22.30885	21.40768	29.96183	28.75316	29.96183	28.75316
381450	3733850	27.02371	26.53988	36.2291	35.57544	36.2291	35.57544	35.59418	34.95062	35.59418	34.95062	36.04691	35.39686	27.02371	26.53988	36.2291	35.57544	36.2291	35.57544
382450	3733850	18.4747	17.53731	24.84248	23.58583	24.84248	23.58583	24.37432	23.13863	24.37432	23.13863	24.65108	23.39954	18.4747	17.53731	24.84248	23.58583	24.84248	23.58583
382950	3733850	14.81112	14.20428	19.96499	19.14787	19.96499	19.14787	19.56669	18.76425	19.56669	18.76425	19.76693	18.95572	14.81112	14.20428	19.96499	19.14787	19.96499	19.14787
383450	3733850	13.06543	12.47036	17.64027	16.8369	17.64027	16.8369	17.27103	16.48492	17.27103	16.48492	17.43442	16.64091	13.06543	12.47036	17.64027	16.8369	17.64027	16.8369
383950	3733850	11.87431	11.40814	16.0537	15.42285	16.0537	15.42285	15.70589	15.08823	15.70589	15.08823	15.8445	15.22154	11.87431	11.40814	16.0537	15.42285	16.0537	15.42285
384950	3733850	10.60532	10.26677	14.36113	13.90222	14.36113	13.90222	14.03669	13.58714	14.03669	13.58714	14.14981	13.69667	10.60532	10.26677	14.36113	13.90222	14.36113	13.90222
388450	3733850	9.193364	8.625655	12.47157	11.70477	12.47157	11.70477	12.17473	11.43312	12.17473	11.43312	12.26208	11.51495	9.193364	8.625655	12.47157	11.70477	12.47157	11.70477
388950	3733850	8.883075	8.468296	12.056	11.49283	12.056	11.49283	11.77292	11.22306	11.77292	11.22306	11.85594	11.30233	8.883075	8.468296	12.056	11.49283	12.056	11.49283
389450	3733850	8.645172	8.217495	11.73674	11.15632	11.73674	11.15632	11.46183	10.89509	11.46183	10.89509	11.54142	10.97068	8.645172	8.217495	11.73674	11.15632	11.73674	11.15632
389950	3733850	8.1616	7.809918	11.08712	10.60826	11.08712	10.60826	10.83156	10.36443	10.83156	10.36443	10.90481	10.43504	8.1616	7.809918	11.08712	10.60826	11.08712	10.60826
380450	3734350	19.62009	18.92515	26.37789	25.44228	26.37789	25.44228	25.92129	25.00251	25.92129	25.00251	26.22344	25.29457	19.62009	18.92515	26.37789	25.44228	26.37789	25.44228
380950	3734350	24.09348	23.40457	32.33025	31.4053	32.33025	31.4053	31.76637	30.85738	31.76637	30.85738	32.15951	31.23943	24.09348	23.40457	32.33025	31.4053	32.33025	31.4053
381450	3734350	29.80597	28.32043	39.92755	37.94195	39.92755	37.94195	39.23313	37.28031	39.23313	37.28031	39.74499	37.76468	29.80597	28.32043	39.92755	37.94195	39.92755	37.94195
382950	3734350	14.27541	13.65786	19.24444	18.41619	19.24444	18.41619	18.86263	18.05027	18.86263	18.05027	19.05546	18.23308	14.27541	13.65786	19.24444	18.41619	19.24444	18.41619
383450	3734350	12.51551	12.15586	16.90171	16.41597	16.90171	16.41597	16.55297	16.07642	16.55297	16.07642	16.70878	16.22764	12.51551	12.15586	16.90171	16.41597	16.90171	16.41597
383950	3734350	11.3393	10.99065	15.33338	14.8595	15.33338	14.8595	15.00568	14.54328	15.00568	14.54328	15.13765	14.67231	11.3393	10.99065	15.33338	14.8595	15.33338	14.8595
384950	3734350	10.21876	10.02307	13.84265	13.57469	13.84265	13.57469	13.53384	13.27222	13.53384	13.27222	13.64163	13.37906	10.21876	10.02307	13.84265	13.57469	13.84265	13.57469
386450	3734350	9.392417	9.076498	12.74148	12.31247	12.74148	12.31247	12.44704	12.02748	12.44704	12.02748	12.53775	12.11523	9.392417	9.076498	12.74148	12.31247	12.74148	12.31247
387950	3734350	9.034588	8.698993	12.2616	11.80582	12.2616	11.80582	11.9716	11.52257	11.9716	11.52257	12.05574	11.61055	9.034588	8.698993	12.2616	11.80582	12.2616	11.80582
389950	3734350	8.027142	7.612164	10.90628	10.34245	10.90628	10.34245	10.65262	10.10416	10.65262	10.10416	10.72364	10.17187	8.027142	7.612164	10.90628	10.34245	10.90628	10.34245
380450	3734850	20.63921	19.93253	27.72914	26.77886	27.72914	26.77886	27.25037	26.31621	27.25037	26.31621	27.57539	26.63032	20.63921	19.93253	27.72914	26.77886	27.72914	26.77886
380950	3734850	25.21378	24.08995	33.81918	32.31348	33.81918	32.31348	33.23265	31.75372	33.23265	31.75372	33.64987	32.15185	25.21378	24.08995	33.81918	32.31348	33.81918	32.31348
381450	3734850	28.59525	27.74118	38.31012	37.16612	38.31012	37.16612	37.64286	36.5192	37.64286	36.5192	38.13217	36.99375	28.59525	27.74118	38.31012	37.16612	38.31012	37.16612
383450	3734850	12.12402	11.89668	16.37843	16.06904	16.37843	16.06904	16.04382	15.74176	16.04382	15.74176	16.1934	15.88944	12.12402	11.89668	16.37843	16.06904	16.37843	16.06904
383950	3734850	11.01918	10.62401	14.8997	14.3647	14.8997	14.3647	14.58773	14.0659	14.58773	14.0659	14.71731	14.1914	11.01918	10.62401	14.8997	14.3647	14.8997	14.3647
387450	3734850	8.736754	8.405758	11.86077	11.41073	11.86077	11.41073	11.58327	11.14297	11.58327	11.14297	11.66384	11.22063	8.736754	8.405758	11.86077	11.41073	11.86077	11.41073
388450	3734850	8.353771	8.094596	11.34576	10.99475	11.34576	10.99475	11.08007	10.73709	11.08007	10.73709	11.15525	10.81152	8.353771	8.094596	11.34576	10.99475	11.34576	10.99475
388950	3734850	8.184158	7.709889	11.11582	10.47262	11.11582	10.47262	10.85368	10.23139	10.85368	10.23139	10.92689	10.30094	8.184158	7.709889	11.11582	10.47262	11.11582	10.47262
389450	3734850	7.854457	7.518672	10.67242	10.21538	10.67242	10.21538	10.42381	9.977833	10.42381	9.977833	10.49296	10.04437	7.854457	7.518672	10.67242	10.21538	10.67242	10.21538
380450	3735350	20.62175	20.31189	27.70133	27.27812	27.70133	27.27812	27.22401	26.80743	27.22401	26.80743	27.55044	27.13148	20.62175	20.31189	27.70133	27.27812	27.70133	27.27812
380950	3735350	24.17236	23.67333	32.41968	31.74814	32.41968	31.74814	31.85699	31.19704	31.85699	31.19704	32.25789	31.59061	24.17236	23.67333	32.41968	31.74814	32.41968	31.74814
381450	3735350	25.97544	25.37101	34.81382	34.00228	34.81382	34.00228	34.2081	33.41039	34.2081	33.41039	34.6476	33.84012	25.97544	25.37101	34.81382	34.00228	34.81382	34.00228
381950	3735350	25.92091	25.20954	34.73941	33.7852	34.73941	33.7852	34.1274	33.18972	34.1274	33.18972	34.56532	33.61583	25.92091	25.20954	34.73941	33.7852	34.73941	33.7852
382950	3735350	14.5947	13.72904	19.65701	18.55262	19.65701	18.55262	19.28144	18.17713	19.28144	18.12383	19.48752	18.39065	14.5947	13.77174	19.65701	18.55262	19.65701	18.55262
383950	3735350	11.26254	10.76492	15.21977	14.54821	15.21977	14.54821	14.90899	14.25068	14.90899	14.25068	15.04602	14.38126	11.26254	10.76492	15.21977	14.54821	15.21977	14.54821
384450	3735350	10.42854	10.14858	14.11048	13.72828	14.11048	13.72828	13.8139	13.43982	13.8139	13.43982	13.93287	13.55687	10.42854	10.14858	14.11048	13.72828	14.11048	13.72828
384950	3735350	9.735844	9.530167	13.18681	12.90355	13.18681	12.90355	12.90457	12.62642	12.90457	12.62642	13.00979	12.73099	9.735844	9.530167	13.18681	12.90355	13.18681	12.90355
387950	3735350	8.161708	7.799376	11.0865	10.59422	11.0865	10.59422	10.82761	10.34783	10.82761	10.34783	10.90061	10.41777	8.161708	7.799376	11.0865	10.59422	11.0865	10.59422
388450	3735350	7.984009	7.65276	10.8701	10.40601	10.8701	10.40601	10.61532	10.1647	10.61532	10.1647	10.68539	10.23343	7.984009	7.65276	10.8701	10.40601	10.8701	10.40601
388950	3735350	7.882258	7.535934	10.72847	10.23819	10.72847	10.23819	10.47654	10.0009	10.47654	10.0009	10.54566	10.0681	7.882258	7.535934	10.72847	10.23819	10.72847	10.23819
389450	3735350	7.516506	7.269797	10.21639	9.878679	10.21639	9.878679	9.979983	9.65118	9.979983	9.65118	10.04521	9.715342	7.516506	7.269797	10.21639	9.878679	10.21639	9.878679
380450	3735850	20.12762	19.35545	27.02415	25.98828	27.02415	25.98828	26.55915	25.53972	26.55915	25.53972	26.88279	25.85049	20.12762	19.35545	27.02415	25.98828	27.02415	25.98828
380950	3735850	22.00568	21.52918	29.52256	28.87977	29.52256	28.87977	29.0108	28.37975	29.0108	28.37975	29.37267	28.73517	22.00568	21.66828	29.52256	28.87977	29.52256	28.87977
381450	3735850	24.01381	23.47087	32.19415	31.46215	32.19415	31.46215	31.63419	30.91388	31.63419	30.91388	32.03713	31.30906	24.01381	23.47087	32.19415	31.46215	32.19415	31.46215
382450	3735850	21.33535	19.99874	28.62383	26.83738	28.62383	26.83738	28.11118	26.35485	28.11118	26.35485	28.45917	26.67829	21.33535	19.99874	28.62383	26.83738	28.62383	26.83738
382950	3735850	16.64593	15.80588	22.38211	21.25533	22.38211	21.25533	21.96652	20.71904	21.96652	20.66314	22.21734	21.09817	16.64593	15.80588	22.38211	21.25533	22.38211	21.25533
383450	3735850	13.0727	12.34175	17.62356	16.64262	17.62356	16.64262	17.28271	16.3199	17.28271	16.3199	17.4605	16.4859	13.0727	12.47595	17.62356	16.79822	17.62356	16.74612
383950	3735850	11.40855	10.60983	15.40806	14.51939	15.40806	14.47126	15.0996	13.98039	15.0996	13.98039	15.24277	14.20681	11.40855	10.74708	15.40806	14.51939	15.40806	14.51939
384450	3735850	10.37225	9.957022	14.02798	13.46672	14.02798	13.45511	13.7488	13.23116	13.73895	13.23116	13.86056	13.30555	10.37225	9.984622	14.02798	13.46672	14.02798	13.46672
384950	3735850	9.678518	9.394504	13.10488	12.71826	13.10488	12.71826	12.82975	12.44995	12.82975	12.44995	12.9368	12.55441	9.678518	9.394504	13.10488	12.71826	13.10488	12.71826
385450	3735850	9.161821	8.889507	12.41496	12.04422	12.41496	12.04422	12.14727	11.78316	12.14727	11.78316	12.24388	11.87733	9.161821	8.889507	12.41496	12.04422	12.41496	12.04422

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
385950	3735850	8.866633	8.535417	12.02074	11.57231	12.02074	11.57231	11.75532	11.31667	11.75532	11.31667	11.84569	11.40343	8.866633	8.535417	12.02074	11.57231	12.02074	11.57231
386450	3735850	8.439587	8.138731	11.44978	11.04057	11.44978	11.04057	11.19301	10.79262	11.19301	10.79262	11.27544	10.87243	8.439587	8.138731	11.44978	11.04057	11.44978	11.04057
386950	3735850	8.341175	8.062501	11.32507	10.94545	11.32507	10.94545	11.0685	10.69777	11.0685	10.69777	11.14629	10.77349	8.341175	8.062501	11.32507	10.94545	11.32507	10.94545
388450	3735850	7.623989	7.29818	10.36128	9.917638	10.36128	9.917638	10.12101	9.688464	10.12101	9.688464	10.18756	9.752597	7.623989	7.29818	10.36128	9.917638	10.36128	9.917638
388950	3735850	7.398797	7.165474	10.05865	9.737931	10.05865	9.737931	9.826259	9.512967	9.826259	9.512967	9.889699	9.575723	7.398797	7.165474	10.05865	9.737931	10.05865	9.737931
380450	3736350	19.59135	18.97044	26.30982	25.47257	26.30982	25.47257	25.85596	25.03214	25.85596	25.03214	26.16882	25.33621	19.59135	18.97044	26.30982	25.47257	26.30982	25.47257
380950	3736350	21.24791	20.58007	28.523	27.12187	28.523	27.12187	28.02845	26.6493	28.02829	26.6493	28.3715	26.97551	21.24791	20.58007	28.523	27.12187	28.523	27.12187
381450	3736350	22.32518	21.80473	29.94396	29.24259	29.94396	29.24259	29.42115	28.73137	29.42115	28.73137	29.79038	29.0931	22.32518	21.80473	29.94396	29.24259	29.94396	29.24259
382450	3736350	19.73531	19.09861	26.49162	25.63663	26.49162	25.63663	26.0172	25.17626	26.0172	25.17626	26.33371	25.48252	19.73531	19.09861	26.49162	25.63663	26.49162	25.63663
382950	3736350	16.59078	15.53127	22.30358	20.88604	22.30358	20.88604	21.89443	20.50038	21.89443	20.50038	22.1468	20.7337	16.59078	15.53127	22.30358	20.88604	22.30358	20.88604
383950	3736350	11.64979	10.97026	15.72325	14.81113	15.72325	14.81113	15.41496	14.52006	15.41496	14.52006	15.56609	14.66042	11.64979	10.97026	15.72325	14.81113	15.72325	14.81113
384450	3736350	10.37847	9.614067	14.0304	13.00481	14.0304	13.00481	13.74631	12.73979	13.74631	12.73979	13.87102	12.85215	10.37847	9.614067	14.0304	13.00481	14.0304	13.00481
384950	3736350	9.412284	9.146145	12.74102	12.37959	12.74102	12.37959	12.4777	12.12263	12.4777	12.12263	12.58372	12.22591	9.412284	9.146145	12.74102	12.37959	12.74102	12.37959
385450	3736350	8.913611	8.731544	12.0765	11.82692	12.0765	11.82692	11.82105	11.57527	11.82105	11.57527	11.91662	11.66973	8.913611	8.731544	12.0765	11.82692	12.0765	11.82692
385950	3736350	8.514833	8.223772	11.54468	11.15016	11.54468	11.15016	11.29362	10.90758	11.29362	10.90758	11.3807	10.99164	8.514833	8.223772	11.54468	11.15016	11.54468	11.15016
386450	3736350	8.410163	8.095781	11.40885	10.98288	11.40885	10.98288	11.15523	10.74007	11.15523	10.74007	11.2381	10.81986	8.410163	8.095781	11.40885	10.98288	11.40885	10.98288
386950	3736350	8.09816	7.83314	10.9934	10.63294	10.9934	10.63294	10.74636	10.39492	10.74636	10.39492	10.82287	10.46931	8.09816	7.83314	10.9934	10.63294	10.9934	10.63294
387450	3736350	7.921414	7.643608	10.75725	10.38021	10.75725	10.38021	10.51196	10.14373	10.51196	10.14373	10.58481	10.21397	7.921414	7.643608	10.75725	10.38021	10.75725	10.38021
387950	3736350	7.725915	7.444338	10.49653	10.11446	10.49653	10.11446	10.25515	9.882694	10.25515	9.882694	10.3241	9.949101	7.725915	7.444338	10.49653	10.11446	10.49653	10.11446
388450	3736350	7.393157	7.123887	10.0494	9.684001	10.0494	9.684001	9.817388	9.462548	9.817388	9.462548	9.881403	9.524343	7.393157	7.123887	10.0494	9.684001	10.0494	9.684001
388950	3736350	7.237419	6.931065	9.840581	9.423956	9.840581	9.423956	9.61356	9.208669	9.61356	9.208669	9.675186	9.268063	7.237419	6.931065	9.840581	9.423956	9.840581	9.423956
380450	3736850	18.5658	17.96726	24.9473	24.13742	24.9473	24.13742	24.51802	23.72127	24.51802	23.72127	24.80919	24.00501	18.5658	17.96726	24.9473	24.13742	24.9473	24.13742
380950	3736850	19.56616	18.87954	26.27859	25.35197	26.27859	25.35197	25.82197	24.90991	25.82197	24.90991	26.13287	25.21139	19.56616	18.87954	26.27859	25.35197	26.27859	25.35197
381450	3736850	20.21239	19.58681	27.12502	26.28527	27.12502	26.28527	26.65119	25.82552	26.65119	25.82552	26.97993	26.14407	20.21239	19.58681	27.12502	26.28527	27.12502	26.28527
382450	3736850	18.3376	17.58712	24.62564	23.61967	24.62564	23.61967	24.18516	23.19624	24.18516	23.19624	24.47556	23.47398	18.3376	17.58712	24.62564	23.61967	24.62564	23.61967
382950	3736850	15.70092	14.60605	21.11336	19.64903	21.11336	19.64903	20.72759	19.28828	20.72759	19.28828	20.96444	19.50532	15.70092	14.60605	21.11336	19.64903	21.11336	19.64903
383450	3736850	13.62825	12.60942	18.35348	16.99024	18.35348	16.99024	18.00886	16.66937	18.00886	16.66937	18.20296	16.84525	13.62825	12.60942	18.35348	16.99024	18.35348	16.99024
383950	3736850	11.83129	11.332	15.95656	15.28665	15.95656	15.28665	15.65035	14.99231	15.65035	14.99231	15.80924	15.143	11.83129	11.332	15.95656	15.28665	15.95656	15.28665
384450	3736850	10.44844	9.871662	14.11618	13.3423	14.11618	13.3423	13.83568	13.0769	13.83568	13.0769	13.96532	13.19736	10.44844	9.871662	14.11618	13.3423	14.11618	13.3423
384950	3736850	9.360047	8.921547	12.66573	12.07648	12.66573	12.07648	12.40817	11.82935	12.40817	11.82935	12.51598	11.93034	9.360047	8.921547	12.66573	12.07648	12.66573	12.07648
385950	3736850	8.290779	8.099007	11.24073	10.97939	11.24073	10.97939	11.00019	10.7446	11.00019	10.7446	11.08565	10.82863	8.290779	8.099007	11.24073	10.97939	11.24073	10.97939
386450	3736850	7.98188	7.770315	10.828	10.54117	10.828	10.54117	10.59124	10.31229	10.59124	10.31229	10.67047	10.38961	7.98188	7.770315	10.828	10.54117	10.828	10.54117
387450	3736850	7.731168	7.41631	10.499	10.07296	10.499	10.07296	10.26281	9.848427	10.26281	9.848427	10.33439	9.916841	7.731168	7.41631	10.499	10.07296	10.499	10.07296
387950	3736850	7.522511	7.293177	10.22077	9.908831	10.22077	9.908831	9.988099	9.683921	9.988099	9.683921	10.0554	9.749413	7.522511	7.293177	10.22077	9.908831	10.22077	9.908831
388450	3736850	7.14036	6.922288	9.705264	9.409583	9.705264	9.409583	9.483191	9.19614	9.483191	9.19614	9.545518	9.256604	7.14036	6.922288	9.705264	9.409583	9.705264	9.409583
388950	3736850	6.92388	6.698619	9.415352	9.108078	9.415352	9.108078	9.19969	8.901347	9.19969	8.901347	9.258489	8.958897	6.92388	6.698619	9.415352	9.108078	9.415352	9.108078
389450	3736850	6.750777	6.567066	9.182917	8.930198	9.182917	8.930198	8.973665	8.726565	8.973665	8.726565	9.030077	8.782456	6.750777	6.567066	9.182917	8.930198	9.182917	8.930198
380450	3737350	16.98872	16.56625	22.84319	22.26696	22.84319	22.26696	22.44987	21.77258	22.44987	21.77258	22.71076	22.13914	16.98872	16.56625	22.84319	22.26696	22.84319	22.26696
380950	3737350	18.2613	17.62774	24.53559	23.68059	24.53559	23.68059	24.10853	23.26691	24.10853	23.26691	24.39507	23.54471	18.2613	17.62774	24.53559	23.68059	24.53559	23.68059
381450	3737350	18.34349	17.66014	24.63026	23.71298	24.63026	23.71298	24.19998	23.2983	24.19998	23.2983	24.49343	23.58059	18.34349	17.66014	24.63026	23.71298	24.63026	23.71298
381950	3737350	17.97487	17.23113	24.13869	23.14167	24.13869	23.14167	23.71264	22.73179	23.71264	22.73179	23.99824	23.00467	17.97487	17.23113	24.13869	23.14167	24.13869	23.14167
382450	3737350	16.80194	16.15822	22.57631	21.71236	22.57631	21.71236	22.17146	21.32362	22.17146	21.32362	22.43256	21.57444	16.80194	16.15822	22.57631	21.71236	22.57631	21.71236
382950	3737350	14.78972	14.02297	19.89495	18.86896	19.89495	18.86896	19.53255	18.52397	19.53255	18.52397	19.75331	18.73105	14.78972	14.02297	19.89495	18.86896	19.89495	18.86896
383450	3737350	13.02545	12.45042	17.54581	16.77465	17.54581	16.77465	17.21739	16.46196	17.21739	16.46196	17.40144	16.63688	13.02545	12.45042	17.54581	16.77465	17.54581	16.77465
383950	3737350	11.61494	10.80431	15.66511	14.58141	15.66511	14.58141	15.36666	14.30119	15.36666	14.30119	15.52284	14.44255	11.61494	10.80431	15.66511	14.58141	15.66511	14.58141
384450	3737350	10.52146	9.983452	14.207	13.48538	14.207	13.48538	13.92925	13.22187	13.92925	13.22187	14.06343	13.34741	10.52146	9.983452	14.207	13.48538	14.207	13.48538
384950	3737350	9.419249	9.009571	12.73869	12.18775	12.73869	12.18775	12.48406	11.94246	12.48406	11.94246	12.59589	12.04802	9.419249	9.009571	12.73869	12.18775	12.73869	12.18775
385450	3737350	8.594672	8.291856	11.64089	11.23133	11.64089	11.23133	11.40086	10.9988	11.40086	10.9988	11.49531	11.08956	8.594672	8.291856	11.64089	11.23133	11.64089	11.23133
385950	3737350	8.234787	7.908776	11.16118	10.72055	11.16118	10.72055	10.92629	10.4933	10.92629	10.4933	11.01317	10.57601	8.234787	7.908776	11.16118	10.72055	11.16118	10.72055
386950	3737350	7.706725	7.476329	10.45778	10.14553	10.45778	10.14553	10.22766	9.92423	10.22766	9.92423	10.30282	9.997287	7.706725	7.476329	10.45778	10.14553	10.45778	10.14553
387950	3737350	7.313286	7.092958	9.935432	9.63562	9.935432	9.63562	9.711466	9.419294	9.711466	9.419294	9.777647	9.483795	7.313286	7.092958	9.935432	9.63562	9.935432	9.63562
388450	3737350	6.967153	6.818341	9.470817	9.266927	9.470817	9.266927	9.256751	9.057952	9.256751	9.057952	9.317641	9.118187	6.967153	6.818341	9.470817	9.266927	9.470817	9.266927
388950	3737350	6.99703	6.75841	9.514542	9.190492	9.514542	9.190492	9.297592	8.982718	9.297592	8.982718	9.35728	9.040494	6.99703	6.75841	9.514542	9.190492	9.514542	9.190492
389450	3737350	6.855006	6.585573	9.325896	8.958905	9.325896	8.958905	9.112245	8.756765	9.112245	8.756765	9.168901	8.811843	6.855006	6.585573	9.325896	8.958905	9.325896	8.958905
380450	3737850	16.0562	15.38064	21.5963	20.68207	21.5963	20.68207	21.22478	20.32433	21.22478	20.32433	21.46884	20.55987	16.0562	15.38064	21.5963	20.68207	21.5963	20.68207
380950	3737850	16.89644	16.56723	22.71052	22.26237	22.71052	22.26237	22.31419	21.87333	22.31419	21.87333	22.57593	22.13201	16.89644	16.56723	22.71052	22.26237	22.71052	22.26237
381450	3737850	17.45849	16.43221	23.45261	22.07912	23.45261	22.07912	23.04221	21.6912	23.04221	21.6912	23.31743	21.94807	17.45849	16.43221	23.45261	22.07912	23.45261	22.07912
381950	3737850	16.58642	15.76988	22.2877	21.19381	22.2877	21.19381	21.89359	20.81753	21.89359	20.81753	22.15191	21.06177	16.58642	15.76988	22.2877	21.19381	22.2877	21.19381
382450	3737850	15.48225	14.84787	20.81495	19.96369	20.81495	19.96369	20.44218	19.60569	20.44218	19.60569	20.67853	19.83179	15.48719	14.84984	20.81495	19.96369	20.81495	19.96369
382950	3737850	13.96622	13.32899	18.79424	17.94041	18.79424	17.94041	18.45218	17.61308	18.45218	17.61308	18.65802	17.80801	13.96622	13.32899	18.79424	17.94041	18.79424	17.94041
383450	3737850	12.34728	11.62364	16.638	15.66878	16.638	15.66878	16.32752	15.3779	16.32752	15.3779	16.49996	15.53833	12.34728	11.62364	16.638	15.66878	16.638	15.66878
383950	3737850	11.27081	10.8289	15.20255	14.60966	15.20255	14.60966	14.91462	14.33154	14.91462	14.33154	15.06585	14.47547	11.27081	10.8289	15.20255	14.60966	15.20255	14.60966
384450	3737850	10.09156	9.481898	13.62926	12.81179	13.62926	12.81179	13.36453	12.56201	13.36453	12.56201	13.49249	12.67989	10.09156	9.481898	13.62926	12.81179	13.62926	12.81179
384950	3737850	9.457652	8.989733	12.78455	12.15612	12.78455	12.15612	12.53257	11.91452	12.53257	11.91452	12.64768	12.0221	9.457652	8.989733	12.78455	12.15612	12.78455	12.15612
385450	3737850	8.727716	8.366531	11.8131	11.32622	11.8131	11.32622	11.57352	11.09547	11.57352	11.09547	11.67302	11.18995	8.727716	8.366531	11.8131	11.32622	11.8131	11.32622
385950	3737850	8.034104	7.806728	10.88933	10.57999	10.88933	10.57999	10.6625	10.35844	10.6625	10.35844	10.74758	10.44136	8.034104	7.806728	10.88933	10.57999	10.88933	10.57999
386450	3737850	7.716595	7.489125	10.46609	10.15677	10.46609	10.15677	10.24351	9.940469	10.24351	9.940469	10.32186	10.01677	7.716595	7.489125	10.46609	10.15677	10.46609	10.15677
386950	3737850	7.49519	7.248395	10.17052	9.836757	10.17052	9.836757	9.950722	9.624075	9.950722	9.624075	10.02453	9.695008	7.49519	7.248395	10.17052	9.836757	10.17052	9.836757
387450	3737850	7.175628	6.993766	9.743777	9.496366	9.743777	9.496366	9.53048	9.289314	9.53048	9.289314	9.598159	9.355576	7.175628	6.993766	9.743777	9.496366	9.743777	9.496366
387950	3737850	7.126087	6.868742	9.679961	9.330591	9.679961	9.330591	9.464271	9.125209	9.464271	9.125209	9.529597	9.18849	7.126087	6.868742	9.679961	9.330591	9.679961	9.330591
388450	3737850	6.817312	6.650529	9.266005	9.03575	9.266005	9.03575	9.059279	8.834937	9.059279	8.834937	9.119647	8.894429	6.817312	6.650529	9.266005	9.03575	9.266005	9.03575
388950	3737850	6.895924	6.651005	9.376415	9.043852	9.376415	9.043852	9.163791	8.841688	9.163791	8.841688	9.223032	8.89912	6.895924	6.651005	9.376415	9.043852	9.376415	9.043852
389450	3737850	6.766168	6.535996	9.204342	8.891445	9.204342	8.891445	8.994598	8.691047	8.994598	8.691047	9.050959	8.745763	6.766168	6.535996	9.204342	8.891445	9.204342	8.891445
380450	3738350	15.26488	14.89231	20.53003	20.02533	20.53003	20.02533	20.17483	19.67818	20.17483	19.67818	20.40725	19.90605	15.26488	14.89231	20.53003	20.02533	20.53003	20.02533
380950	3738350	15.69099	15.05962	21.09396	20.24608	21.09396	20.24608	20.72654	19.89306	20.72654	19.89306	20.96838	20.12473	15.69099	15.05962	21.09396	20.24608	21.09396	20.24608
381450	3738350	16.15603	15.23976	21.71701	20.48789	21.71701	20.48789	21.33472	20.1265	21.33472	20.1265	21.58385	20.3604	16.15603	15.23976	21.71701	20.48789	21.71701	20.48789
381950	3738350	15.32787	14.47108	20.60863	19.46159	20.60863	19.46159	20.24408	19.11528	20.24408	19.11528	20.47838	19.33441	15.32787	14.47108	20.60863	19.46159	20.60863	19.46159
382450	3738350	14.42283	13.78805	19.40183	18.55042	19.40183	18.55042	19.05433	18.21718	19.05433	18.21718	19.27035	18.42266	14.42283	13.78805	19.40183	18.55042	19.40183	18.55042
382950	3738350	13.2252	12.45594	17.80461	16.77506	17.80461	16.77506	17.48039	16.46933	17.48039	16.46933	17.6726	16.64797	13.2252	12.45594	17.80461	16.77506	17.80461	16.77506
383450	3738350	11.67989	11.25942	15.74497	15.18005	15.74497	15.18005	15.45254	14.89955	15.45254	14.89955	15.6136	15.05435	11.67989	11.25942	15.74497	15.18005	15.74497	15.18005
383950	3738350	10.8333	10.43929	14.61655	14.0876	14.61655	14.0876	14.34094	13.82103	14.34094	13.82103	14.4849	13.9587	10.8333	10.43929	14.61655	14.0876	14.61655	14.0876
384450	3738350	10.16029	9.475404	13.71949	12.80278	13.71949	12.80278	13.45527	12.55574	13.45527	12.55574	13.58543	12.67405	10.16029	9.475404	13.71949	12.80278	13.71949	12.80278
384950	3738350	9.224855	8.811744	12.4722	11.9179	12.4722	11.9179	12.22827	11.68332	12.22827	11.68332	12.33999	11.78823	9.224855	8.811744	12.4722	11.9179	12.4722	11.9179
385450	3738350	8.993042	8.399302	12.16778	11.3713	12.16778	11.3713	11.923	11.14226	11.923	11.14226	12.02751	11.23726	8.993042	8.399302	12.16778	11.3713	12.16778	11.3713
385950	3738350	8.194304	7.880463	11.09982	10.67684	11.09982	10.67684	10.87248	10.45662	10.87248	10.45662	10.96233	10.54199	8.194304	7.880463	11.09982	10.67684	11.09982	10.67684
386450	3738350	7.602166	7.373243	10.3098	9.998982	10.3098	9.998982	10.09351	9.788669	10.09351	9.788669	10.17157	9.864447	7.602166	7.373243	10.3098	9.998982	10.3098	9.998982
386950	3738350	7.34882	7.05151	9.972099	9.570522	9.972099	9.570522	9.758638	9.36732	9.758638	9.36732	9.831257	9.436566	7.34882	7.05151	9.972099	9.570522	9.972099	9.570522

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
387450	3738350	7.207476	6.920427	9.784413	9.39755	9.784413	9.39755	9.571803	9.194759	9.571803	9.194759	9.640996	9.260373	7.207476	6.920427	9.784413	9.39755	9.784413	9.39755
387950	3738350	6.976532	6.694276	9.477133	9.095587	9.477133	9.095587	9.268814	8.897987	9.268814	8.897987	9.333105	8.959353	6.976532	6.694276	9.477133	9.095587	9.477133	9.095587
388450	3738350	6.666504	6.499772	9.060986	8.833097	9.060986	8.833097	8.860739	8.637762	8.860739	8.637762	8.920147	8.696137	6.666504	6.499772	9.060986	8.833097	9.060986	8.833097
388950	3738350	6.783395	6.631169	9.215428	9.008142	9.215428	9.008142	9.009038	8.806649	9.009038	8.806649	9.067593	8.86462	6.783395	6.631169	9.215428	9.008142	9.215428	9.008142
389450	3738350	6.62552	6.434038	9.012856	8.751644	9.012856	8.751644	8.809969	8.555929	8.809969	8.555929	8.865614	8.610438	6.62552	6.434038	9.012856	8.751644	9.012856	8.751644
380450	3738850	13.88671	13.51576	18.68245	18.18331	18.68245	18.18331	18.36025	17.8692	18.36025	17.8692	18.56964	18.07292	13.88671	13.51576	18.68245	18.18331	18.68245	18.18331
380950	3738850	14.51959	13.99578	19.52779	18.82468	19.52779	18.82468	19.18844	18.49729	19.18844	18.49729	19.40911	18.70948	14.51959	13.99578	19.52779	18.82468	19.52779	18.82468
381450	3738850	14.34626	13.7383	19.29656	18.48126	19.29656	18.48126	18.95818	18.15595	18.95818	18.15595	19.1752	18.36256	14.34626	13.7383	19.29656	18.48126	19.29656	18.48126
381950	3738850	14.01596	13.17763	18.85656	17.73359	18.85656	17.73359	18.52201	17.41949	18.52201	17.41949	18.73176	17.6149	14.01596	13.17763	18.85656	17.73359	18.85656	17.73359
382450	3738850	13.45432	12.84719	18.11	17.29497	18.11	17.29497	17.78547	16.98393	17.78547	16.98393	17.98296	17.17147	13.45432	12.84719	18.11	17.29497	18.11	17.29497
382950	3738850	12.50646	11.91283	16.84521	16.04951	16.84521	16.04951	16.53865	15.75702	16.53865	15.75702	16.71739	15.92574	12.50646	11.91283	16.84521	16.04951	16.84521	16.04951
383450	3738850	11.41964	10.9694	15.39644	14.79217	15.39644	14.79217	15.11173	14.51935	15.11173	14.51935	15.26861	14.66923	11.41964	10.9694	15.39644	14.79217	15.39644	14.79217
383950	3738850	10.49786	9.998743	14.16817	13.4989	14.16817	13.4989	13.9015	13.24433	13.9015	13.24433	14.03963	13.37418	10.49786	9.998743	14.16817	13.4989	14.16817	13.4989
384450	3738850	9.881919	9.481915	13.34629	12.80919	13.34629	12.80919	13.09057	12.56437	13.09057	12.56437	13.21638	12.68402	9.881919	9.481915	13.34629	12.80919	13.34629	12.80919
384950	3738850	9.198574	8.586226	12.43508	11.61545	12.43508	11.61545	12.19409	11.38827	12.19409	11.38827	12.30642	11.48977	9.198574	8.586226	12.43508	11.61545	12.43508	11.61545
385450	3738850	8.529748	8.208725	11.54329	11.11052	11.54329	11.11052	11.31303	10.88933	11.31303	10.88933	11.41159	10.98362	8.529748	8.208725	11.54329	11.11052	11.54329	11.11052
385950	3738850	8.211107	7.788808	11.11931	10.55171	11.11931	10.55171	10.89423	10.33612	10.89423	10.33612	10.98591	10.42118	8.211107	7.788808	11.11931	10.55171	11.11931	10.55171
386450	3738850	7.833664	7.489648	10.61798	10.15328	10.61798	10.15328	10.39764	9.941918	10.39764	9.941918	10.48062	10.02055	7.833664	7.489648	10.61798	10.15328	10.61798	10.15328
386950	3738850	7.281696	7.025082	9.879847	9.531505	9.879847	9.531505	9.670842	9.330411	9.670842	9.330411	9.743629	9.400789	7.281696	7.025082	9.879847	9.531505	9.879847	9.531505
387450	3738850	6.999351	6.727021	9.502786	9.134359	9.502786	9.134359	9.298203	8.939537	9.298203	8.939537	9.365365	9.003885	6.999351	6.727021	9.502786	9.134359	9.502786	9.134359
387950	3738850	6.795861	6.554038	9.231031	8.903762	9.231031	8.903762	9.03064	8.712004	9.03064	8.712004	9.093929	8.772824	6.795861	6.554038	9.231031	8.903762	9.231031	8.903762
388450	3738850	6.572382	6.311042	8.931616	8.577485	8.931616	8.577485	8.73581	8.390887	8.73581	8.390887	8.795176	8.447743	6.572382	6.311042	8.931616	8.577485	8.931616	8.577485
388950	3738850	6.476885	6.295839	8.806743	8.559866	8.806743	8.559866	8.611946	8.371313	8.611946	8.371313	8.668337	8.426514	6.476885	6.295839	8.806743	8.559866	8.806743	8.559866
389450	3738850	6.531322	6.269548	8.876711	8.519159	8.876711	8.519159	8.677753	8.330644	8.677753	8.330644	8.73315	8.384062	6.537032	6.269548	8.876711	8.519159	8.876711	8.519159
380450	3739350	13.09099	12.6521	17.62083	17.03117	17.62083	17.03117	17.31617	16.73675	17.31617	16.73675	17.51021	16.92382	13.09099	12.6521	17.62083	17.03117	17.62083	17.03117
380950	3739350	13.52906	12.97747	18.20667	17.46613	18.20667	17.46613	17.88905	17.16185	17.88905	17.16185	18.09049	17.35445	13.52906	12.97747	18.20667	17.46613	18.20667	17.46613
381450	3739350	13.20439	12.86846	17.77318	17.31998	17.77318	17.31998	17.46082	17.01509	17.46082	17.01509	17.65573	17.20538	13.20439	12.86846	17.77318	17.31998	17.77318	17.31998
381950	3739350	12.98637	12.24076	17.48168	16.4826	17.48168	16.4826	17.17162	16.19034	17.17162	16.19034	17.36209	16.3683	12.98637	12.24076	17.48168	16.4826	17.48168	16.4826
382450	3739350	12.45415	12.02099	16.77419	16.19059	16.77419	16.19059	16.4738	15.90028	16.4738	15.90028	16.65281	16.07299	12.45415	12.02099	16.77419	16.19059	16.77419	16.19059
382950	3739350	11.78426	11.41	15.88234	15.37723	15.88234	15.37723	15.58308	15.09644	15.58308	15.09644	15.75905	15.25647	11.78426	11.41	15.88234	15.37723	15.88234	15.37723
383450	3739350	11.02268	10.53517	14.86572	14.21137	14.86572	14.21137	14.59112	13.94916	14.59112	13.94916	14.74094	14.09135	11.02268	10.53517	14.86572	14.21137	14.86572	14.21137
383950	3739350	10.10728	9.558157	13.64537	12.90916	13.64537	12.90916	13.38906	12.66597	13.38906	12.66597	13.52051	12.78825	10.10728	9.558157	13.64537	12.90916	13.64537	12.90916
384450	3739350	9.55707	9.208436	12.91196	12.44229	12.91196	12.44229	12.66519	12.20531	12.66519	12.20531	12.78533	12.3207	9.55707	9.208436	12.91196	12.44229	12.91196	12.44229
384950	3739350	9.001248	8.655448	12.17075	11.70579	12.17075	11.70579	11.93602	11.47886	11.93602	11.47886	12.04524	11.58274	9.001248	8.655448	12.17075	11.70579	12.17075	11.70579
385450	3739350	8.53741	7.893005	11.55276	10.68935	11.55276	10.68935	11.32368	10.47682	11.32368	10.47682	11.42287	10.56526	8.53741	7.893005	11.55276	10.68935	11.55276	10.68935
385950	3739350	7.980346	7.750138	10.80864	10.49706	10.80864	10.49706	10.59104	10.2848	10.59104	10.2848	10.67967	10.37062	7.980346	7.750138	10.80864	10.49706	10.80864	10.49706
386450	3739350	7.746123	7.329793	10.49655	9.936391	10.49655	9.936391	10.28164	9.731793	10.28164	9.731793	10.36517	9.809186	7.746123	7.329793	10.49655	9.936391	10.49655	9.936391
386950	3739350	7.301872	6.977135	9.903396	9.464496	9.903396	9.464496	9.69735	9.266719	9.69735	9.266719	9.772296	9.337635	7.301872	6.977135	9.903396	9.464496	9.903396	9.464496
387450	3739350	6.955151	6.700724	9.440956	9.09624	9.440956	9.09624	9.240444	8.904074	9.240444	8.904074	9.308307	8.969362	6.955151	6.700724	9.440956	9.09624	9.440956	9.09624
387950	3739350	6.647825	6.473839	9.030335	8.79406	9.030335	8.79406	8.835827	8.605782	8.835827	8.605782	8.897827	8.666327	6.647825	6.473839	9.030335	8.79406	9.030335	8.79406
388450	3739350	6.460771	6.193246	8.778982	8.417031	8.778982	8.417031	8.58858	8.235927	8.58858	8.235927	8.647606	8.292169	6.460771	6.193246	8.778982	8.417031	8.778982	8.417031
388950	3739350	6.369675	6.150809	8.659508	8.362493	8.659508	8.362493	8.47018	8.180273	8.47018	8.180273	8.52655	8.234597	6.369675	6.150809	8.659508	8.362493	8.659508	8.362493
389450	3739350	6.212039	6.015912	8.449064	8.182268	8.449064	8.182268	8.263127	8.002963	8.263127	8.002963	8.316462	8.054756	6.212039	6.015912	8.449064	8.182268	8.449064	8.182268
380450	3739850	12.43778	11.80338	16.74839	15.8986	16.74839	15.8986	16.45937	15.62365	16.45937	15.62365	16.64117	15.79448	12.43778	11.80338	16.74839	15.8986	16.74839	15.8986
380950	3739850	12.26567	11.87611	16.51734	15.99294	16.51734	15.99294	16.22965	15.71421	16.22965	15.71421	16.40827	15.88708	12.26567	11.87611	16.51734	15.99294	16.51734	15.99294
381450	3739850	12.26742	11.8712	16.52076	15.98727	16.52076	15.98727	16.23111	15.70612	16.23111	15.70612	16.4091	15.87819	12.26742	11.8712	16.52076	15.98727	16.52076	15.98727
381950	3739850	12.15026	11.55427	16.36525	15.56553	16.36525	15.56553	16.07597	15.28896	16.07597	15.28896	16.25099	15.45405	12.15026	11.55427	16.36525	15.56553	16.36525	15.56553
382450	3739850	11.62916	11.171	15.67097	15.05446	15.67097	15.05446	15.39056	14.78408	15.39056	14.78408	15.55474	14.94127	11.62916	11.171	15.67097	15.05446	15.67097	15.05446
382950	3739850	11.1018	10.77488	14.96915	14.5269	14.96915	14.5269	14.69726	14.26363	14.69726	14.26363	14.85005	14.41261	11.1018	10.77488	14.96915	14.5269	14.96915	14.5269
383450	3739850	10.6123	10.02924	14.31576	13.53403	14.31576	13.53403	14.05213	13.2846	14.05213	13.2846	14.19521	13.41801	10.6123	10.02924	14.31576	13.53403	14.31576	13.53403
383950	3739850	9.728634	9.330002	13.13716	12.60195	13.13716	12.60195	12.89113	12.36604	12.89113	12.36604	13.01666	12.4853	9.728634	9.330002	13.13716	12.60195	13.13716	12.60195
384450	3739850	9.329751	8.81578	12.60729	11.91773	12.60729	11.91773	12.36721	11.69125	12.36721	11.69125	12.48372	11.79959	9.329751	8.81578	12.60729	11.91773	12.60729	11.91773
384950	3739850	8.859481	8.540087	11.97939	11.54993	11.97939	11.54993	11.74982	11.32765	11.74982	11.32765	11.85742	11.43034	8.859481	8.540087	11.97939	11.54993	11.97939	11.54993
385450	3739850	8.537525	7.953486	11.55117	10.7689	11.55117	10.7689	11.32378	10.55654	11.32378	10.55654	11.42389	10.6468	8.537525	7.953486	11.55117	10.7689	11.55117	10.7689
385950	3739850	7.896221	7.486959	10.69449	10.14535	10.69449	10.14535	10.48055	9.940876	10.48055	9.940876	10.56853	10.02214	7.896221	7.486959	10.69449	10.14535	10.69449	10.14535
386450	3739850	7.566628	7.326076	10.25407	9.929177	10.25407	9.929177	10.04595	9.727291	10.04595	9.727291	10.12755	9.805859	7.566628	7.326076	10.25407	9.929177	10.25407	9.929177
386950	3739850	7.291088	6.920148	9.885812	9.386449	9.885812	9.386449	9.682626	9.192487	9.682626	9.192487	9.758972	9.263452	7.291088	6.920148	9.885812	9.386449	9.885812	9.386449
387450	3739850	6.956524	6.64716	9.439765	9.022519	9.439765	9.022519	9.242282	8.833426	9.242282	8.833426	9.311757	8.898819	6.956524	6.64716	9.439765	9.022519	9.439765	9.022519
387950	3739850	6.615076	6.360775	8.983249	8.640175	8.983249	8.640175	8.792564	8.458752	8.792564	8.458752	8.855663	8.51892	6.615076	6.360775	8.983249	8.640175	8.983249	8.640175
388450	3739850	6.336035	6.109189	8.609746	8.30285	8.609746	8.30285	8.424587	8.127156	8.424587	8.127156	8.482639	8.18308	6.336035	6.109189	8.609746	8.30285	8.609746	8.30285
388950	3739850	6.264456	6.042537	8.515522	8.215874	8.515522	8.215874	8.330447	8.038137	8.330447	8.038137	8.38641	8.091501	6.264456	6.042537	8.515522	8.215874	8.515522	8.215874
389450	3739850	6.086198	5.934397	8.277675	8.071349	8.277675	8.071349	8.09741	7.895434	8.09741	7.895434	8.150067	7.946703	6.086198	5.934397	8.277675	8.071349	8.277675	8.071349
380450	3740350	11.87241	11.47544	15.9949	15.46081	15.9949	15.46081	15.71852	15.19313	15.71852	15.19313	15.88912	15.3577	11.87241	11.47544	15.9949	15.46081	15.9949	15.46081
380950	3740350	11.90276	11.30268	16.03376	15.22939	16.03376	15.22939	15.75462	14.96302	15.75462	14.96302	15.92609	15.12416	11.90276	11.30268	16.03376	15.22939	16.03376	15.22939
381450	3740350	11.47005	10.97133	15.45418	14.78402	15.45418	14.78402	15.18301	14.52504	15.18301	14.52504	15.34674	14.68102	11.47005	10.97133	15.45418	14.78402	15.45418	14.78402
381950	3740350	11.44427	10.91986	15.42246	14.71821	15.42246	14.71821	15.14922	14.4569	15.14922	14.4569	15.3111	14.61021	11.44427	10.91986	15.42246	14.71821	15.42246	14.71821
382450	3740350	11.03443	10.52622	14.87615	14.19322	14.87615	14.19322	14.61008	13.93853	14.61008	13.93853	14.76343	14.08389	11.03443	10.52622	14.87615	14.19322	14.87615	14.19322
382950	3740350	10.56255	10.12813	14.2474	13.66247	14.2474	13.66247	13.98867	13.41558	13.98867	13.41558	14.13213	13.55296	10.56255	10.12813	14.2474	13.66247	14.2474	13.66247
383450	3740350	10.09484	9.504595	13.6223	12.83137	13.6223	12.83137	13.37237	12.59538	13.37237	12.59538	13.50691	12.71992	10.09484	9.504595	13.6223	12.83137	13.6223	12.83137
383950	3740350	9.403597	9.194403	12.70195	12.41892	12.70195	12.41892	12.46456	12.18784	12.46456	12.18784	12.58462	12.30555	9.403597	9.194403	12.70195	12.41892	12.70195	12.41892
384450	3740350	8.799142	8.325561	11.89439	11.26003	11.89439	11.26003	11.66908	11.0465	11.66908	11.0465	11.77764	11.14703	8.799142	8.325561	11.89439	11.26003	11.89439	11.26003
384950	3740350	8.439251	8.230013	11.41394	11.13201	11.41394	11.13201	11.19608	10.91917	11.19608	10.91917	11.29771	11.01782	8.439251	8.230013	11.41394	11.13201	11.41394	11.13201
385450	3740350	8.198273	7.862704	11.09511	10.64436	11.09511	10.64436	10.87783	10.43651	10.87783	10.43651	10.97304	10.52669	8.198273	7.862704	11.09511	10.64436	11.09511	10.64436
385950	3740350	7.849814	7.339646	10.62947	9.946715	10.62947	9.946715	10.41902	9.747613	10.41902	9.747613	10.50762	9.827127	7.849814	7.339646	10.62947	9.946715	10.62947	9.946715
386450	3740350	7.453248	7.069781	10.10132	9.586673	10.10132	9.586673	9.89789	9.392253	9.89789	9.392253	9.978201	9.466341	7.453248	7.069781	10.10132	9.586673	10.10132	9.586673
386950	3740350	7.172801	6.861555	9.725374	9.306666	9.725374	9.306666	9.52659	9.116482	9.52659	9.116482	9.601886	9.187294	7.172801	6.861555	9.725374	9.306666	9.725374	9.306666
387450	3740350	6.955829	6.552992	9.43583	8.893985	9.43583	8.893985	9.240104	8.710289	9.240104	8.710289	9.31095	8.775439	6.955829	6.552992	9.43583	8.893985	9.43583	8.893985
387950	3740350	6.640218	6.335018	9.014334	8.60363	9.014334	8.60363	8.824463	8.423275	8.824463	8.423275	8.889179	8.483808	6.640218	6.335018	9.014334	8.60363	9.014334	8.60363
388450	3740350	6.258862	6.08063	8.503231	8.262586	8.503231	8.262586	8.322384	8.08868	8.322384	8.08868	8.380666	8.145023	6.258862	6.08063	8.503231	8.262586	8.503231	8.262586
388950	3740350	6.167039	5.939925	8.382484	8.07646	8.382484	8.07646	8.200892	7.904402	8.200892	7.904402	8.256298	7.95724	6.167039	5.939925	8.382484	8.07646	8.382484	8.07646
389450	3740350	5.997524	5.802429	8.156171	7.892749	8.156171	7.892749	7.979326	7.722568	7.979326	7.722568	8.031669	7.772652	5.997524	5.802429	8.156171	7.892749	8.156171	7.892749
380450	3740850	11.1731	10.82329	15.05981	14.58858	15.05981	14.58858	14.79882	14.33647	14.79882	14.33647	14.95664	14.48936	11.1731	10.82329	15.05981	14.58858	15.05981	14.58858
380950	3740850	10.97712	10.47438	14.79496	14.1209	14.79496	14.1209	14.53775	13.87515	14.53775	13.87515	14.69288	14.02188	10.97712	10.47438	14.79496	14.1209	14.79496	14.1209
381450	3740850	11.00698	10.57816	14.83704	14.26046	14.83704	14.26046	14.57596	14.01026	14.57596	14.01026	14.73039	14.1583	11.00698	10.57816	14.83704	14.26046	14.83704	14.26046
381950	3740850	10.67556	10.16121	14.39436	13.70381	14.39436	13.70381	14.13993	13.46128	14.13993	13.46128	14.28805	13.60109	10.67556	10.16121	14.39436	13.70381	14.39436	13.70381
382450	3740850	10.42925	9.944524	14.06657	13.41526	14.06657	13.41526	13.81494	13.1752	13.81494	13.1752	13.95756	13.31026	10.42925	9.944524	14.06657	13.41526	14.06657	13.41526
382950	3740850	10.06869	9.593855	13.58679	12.94783	13.58679	12.94783	13.3403	12.71439	13.3403	12.71439	13.47503	12.84236	10.06869	9.593855	13.58679	12.94783	13.58679	12.94783

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
383450	3740850	9.60402	9.182789	12.96716	12.40017	12.96716	12.40017	12.72012	12.17287	12.71868	12.17287	12.85541	12.29213	9.60402	9.182789	12.96716	12.40017	12.96716	12.40017
383950	3740850	9.106799	8.76943	12.30307	11.84944	12.30307	11.84944	12.07408	11.62987	12.07408	11.62987	12.18974	11.74061	9.106799	8.76943	12.30307	11.84944	12.30307	11.84944
384450	3740850	8.529853	8.160827	11.53405	11.03891	11.53405	11.03891	11.31591	10.83038	11.31591	10.83038	11.41985	10.92844	8.529853	8.160827	11.53405	11.03891	11.53405	11.03891
384950	3740850	8.249722	7.892022	11.15937	10.67994	11.15937	10.67994	10.94722	10.47623	10.94722	10.47623	11.04607	10.56902	8.249722	7.892022	11.15937	10.67994	11.15937	10.67994
385450	3740850	8.031741	7.75564	10.86999	10.49902	10.86999	10.49902	10.65853	10.29538	10.65853	10.29538	10.75196	10.38469	8.031741	7.75564	10.86999	10.49902	10.86999	10.49902
385950	3740850	7.621579	7.358371	10.32157	9.968529	10.32157	9.968529	10.11857	9.771784	10.11857	9.771784	10.2044	9.85328	7.621579	7.358371	10.32157	9.968529	10.32157	9.968529
386450	3740850	7.222836	6.833316	9.788139	9.266294	9.788139	9.266294	9.592589	9.080118	9.592589	9.080118	9.671014	9.151914	7.222836	6.833316	9.788139	9.266294	9.788139	9.266294
386950	3740850	6.965464	6.679428	9.445649	9.06139	9.445649	9.06139	9.25385	8.877088	9.25385	8.877088	9.326644	8.945513	6.965464	6.679428	9.445649	9.06139	9.445649	9.06139
387450	3740850	6.843631	6.497739	9.283573	8.818065	9.283573	8.818065	9.092478	8.637668	9.092478	8.637668	9.162431	8.702923	6.843631	6.497739	9.283573	8.818065	9.283573	8.818065
387950	3740850	6.637063	6.252997	9.007727	8.491321	9.007727	8.491321	8.820041	8.315413	8.820041	8.315413	8.88592	8.37585	6.637063	6.252997	9.007727	8.491321	9.007727	8.491321
388450	3740850	6.249254	5.947288	8.486957	8.08212	8.486957	8.08212	8.308671	7.913325	8.308671	7.913325	8.368396	7.96838	6.249254	5.947288	8.486957	8.08212	8.486957	8.08212
388950	3740850	6.109107	5.897537	8.30209	8.017462	8.30209	8.017462	8.124204	7.848166	8.124204	7.848166	8.180005	7.901381	6.109107	5.897537	8.30209	8.017462	8.30209	8.017462
389450	3740850	5.915522	5.75158	8.043767	7.822903	8.043767	7.822903	7.870396	7.655228	7.870396	7.655228	7.922524	7.705299	5.915522	5.75158	8.043767	7.822903	8.043767	7.822903
380450	3741350	10.57388	10.25062	14.25906	13.82379	14.25906	13.82379	14.01183	13.58401	14.01183	13.58401	14.15863	13.72608	10.57388	10.25062	14.25906	13.82379	14.25906	13.82379
380950	3741350	10.04468	9.811957	13.54691	13.23346	13.54691	13.23346	13.31208	13.00405	13.31208	13.00405	13.45107	13.13955	10.04468	9.811957	13.54691	13.23346	13.54691	13.23346
381450	3741350	10.3843	10.0508	14.00421	13.55528	14.00421	13.55528	13.75849	13.31747	13.75849	13.31747	13.90189	13.45604	10.3843	10.0508	14.00421	13.55528	14.00421	13.55528
381950	3741350	10.09981	9.608897	13.6247	12.966	13.6247	12.966	13.38392	12.73645	13.38392	12.73645	13.52162	12.86608	10.09981	9.608897	13.6247	12.966	13.6247	12.966
382450	3741350	9.880423	9.45288	13.33222	12.75784	13.33222	12.75784	13.09398	12.5299	13.09398	12.5299	13.22698	12.65621	9.880423	9.45288	13.33222	12.75784	13.33222	12.75784
382950	3741350	9.585016	9.092003	12.93822	12.27597	12.93822	12.27597	12.70434	12.05568	12.70434	12.05568	12.83123	12.17511	9.585016	9.092003	12.93822	12.27597	12.93822	12.27597
383450	3741350	9.167705	8.876338	12.38222	11.98904	12.38222	11.98904	12.15632	11.77043	12.15632	11.77043	12.27466	11.8849	9.167705	8.876338	12.38222	11.98904	12.38222	11.98904
383950	3741350	8.752606	8.460139	11.82726	11.43397	11.82726	11.43397	11.60794	11.22299	11.60794	11.22299	11.71824	11.32907	8.752606	8.460139	11.82726	11.43397	11.82726	11.43397
384450	3741350	8.354958	8.016274	11.297	10.84325	11.297	10.84325	11.08465	10.63956	11.08465	10.63956	11.18688	10.73611	8.354958	8.016274	11.297	10.84325	11.297	10.84325
384950	3741350	7.958562	7.539584	10.76842	10.20798	10.76842	10.20798	10.56427	10.01367	10.56427	10.01367	10.65863	10.10055	7.958562	7.539584	10.76842	10.20798	10.76842	10.20798
385450	3741350	7.717838	7.489979	10.44714	10.14104	10.44714	10.14104	10.24507	9.945304	10.24507	9.945304	10.33428	10.0311	7.717838	7.489979	10.44714	10.14104	10.44714	10.14104
385950	3741350	7.276041	7.076729	9.854924	9.587202	9.854924	9.587202	9.662547	9.39975	9.662547	9.39975	9.744239	9.47833	7.276041	7.076729	9.854924	9.587202	9.854924	9.587202
386450	3741350	7.117188	6.782537	9.644114	9.195683	9.644114	9.195683	9.452877	9.012761	9.452877	9.012761	9.5307	9.084971	7.117188	6.782537	9.644114	9.195683	9.644114	9.195683
386950	3741350	6.789652	6.521568	9.207909	8.847784	9.207909	8.847784	9.021956	8.668902	9.021956	8.668902	9.092834	8.735676	6.789652	6.521568	9.207909	8.847784	9.207909	8.847784
387450	3741350	6.665353	6.358303	9.042905	8.630043	9.042905	8.630043	8.858309	8.454702	8.858309	8.454702	8.926268	8.518274	6.665353	6.358303	9.042905	8.630043	9.042905	8.630043
387950	3741350	6.525305	6.208293	8.856098	8.429192	8.856098	8.429192	8.673525	8.255881	8.673525	8.255881	8.738591	8.316617	6.525305	6.208293	8.856098	8.429192	8.856098	8.429192
388950	3741350	6.077107	5.752613	8.256574	7.821	8.256574	7.821	8.081882	7.658089	8.081882	7.658089	8.138509	7.710139	6.077107	5.752613	8.256574	7.821	8.256574	7.821
389450	3741350	5.861639	5.679718	7.969117	7.723744	7.969117	7.723744	7.798659	7.560398	7.798659	7.560398	7.851016	7.610726	5.861639	5.679718	7.969117	7.723744	7.969117	7.723744
380450	3741850	9.842665	9.501055	13.2792	12.8205	13.2792	12.8205	13.05004	12.59895	13.05004	12.59895	13.18457	12.72798	9.842665	9.501055	13.2792	12.8205	13.2792	12.8205
380950	3741850	9.906662	9.47271	13.36445	12.78256	13.36445	12.78256	13.13198	12.5606	13.13198	12.5606	13.26757	12.68897	9.906662	9.47271	13.36445	12.78256	13.36445	12.78256
381450	3741850	9.639732	9.29377	13.00648	12.5421	13.00648	12.5421	12.77924	12.32248	12.77924	12.32248	12.91018	12.44775	9.639732	9.29377	13.00648	12.5421	13.00648	12.5421
381950	3741850	9.576137	9.162243	12.92358	12.36813	12.92358	12.36813	12.69548	12.14943	12.69548	12.14943	12.82412	12.27129	9.576137	9.162243	12.92358	12.36813	12.92358	12.36813
382450	3741850	9.339979	8.950148	12.6085	12.0851	12.6085	12.0851	12.38384	11.86936	12.38384	11.86936	12.50763	11.98685	9.339979	8.950148	12.6085	12.0851	12.6085	12.0851
382950	3741850	9.143628	8.738541	12.34639	11.8023	12.34639	11.8023	12.12425	11.59038	12.12425	11.59038	12.244	11.70383	9.143628	8.738541	12.34639	11.8023	12.34639	11.8023
383450	3741850	8.730179	8.515468	11.7951	11.50488	11.7951	11.50488	11.58044	11.29528	11.58044	11.29528	11.6918	11.40391	8.730179	8.515468	11.7951	11.50488	11.7951	11.50488
383950	3741850	8.390007	8.059075	11.34001	10.89291	11.34001	10.89291	11.13065	10.69226	11.13065	10.69226	11.23552	10.79189	8.395797	8.059075	11.34001	10.89615	11.34001	10.89615
384450	3741850	8.042216	7.803455	10.87669	10.55592	10.87669	10.55592	10.6732	10.35859	10.6732	10.35859	10.77081	10.45253	8.042216	7.803455	10.87669	10.55592	10.87669	10.55592
384950	3741850	7.533318	7.331627	10.19671	9.925474	10.19671	9.925474	10.004	9.738045	10.004	9.738045	10.09207	9.823128	7.533318	7.331627	10.19671	9.925474	10.19671	9.925474
385450	3741850	7.470896	7.1963	10.11451	9.745922	10.11451	9.745922	9.919964	9.558418	9.919964	9.558418	10.00592	9.640008	7.470896	7.1963	10.11451	9.745922	10.11451	9.745922
385950	3741850	7.185797	6.97381	9.732777	9.447899	9.732777	9.447899	9.543878	9.264271	9.543878	9.264271	9.624707	9.341839	7.185797	6.97381	9.732777	9.447899	9.732777	9.447899
386450	3741850	6.968694	6.769863	9.444058	9.176413	9.444058	9.176413	9.257723	8.994991	9.257723	8.994991	9.333631	9.068007	6.968694	6.769863	9.444058	9.176413	9.444058	9.176413
386950	3741850	6.774643	6.350139	9.185334	8.616529	9.185334	8.616529	9.001207	8.443339	9.001207	8.443339	9.07298	8.508047	6.774643	6.350139	9.185334	8.616529	9.185334	8.616529
387450	3741850	6.43759	6.237615	8.736377	8.466338	8.736377	8.466338	8.559205	8.29514	8.559205	8.29514	8.624109	8.357604	6.43759	6.237615	8.736377	8.466338	8.736377	8.466338
387950	3741850	6.368915	6.083942	8.644699	8.260522	8.644699	8.260522	8.467683	8.091632	8.467683	8.091632	8.53106	8.151238	6.368915	6.083942	8.644699	8.260522	8.644699	8.260522
388950	3741850	6.053673	5.698119	8.222626	7.745543	8.222626	7.745543	8.050917	7.584824	8.050917	7.584824	8.108469	7.636994	6.053673	5.698119	8.222626	7.745543	8.222626	7.745543
389450	3741850	5.853672	5.535075	7.95556	7.52799	7.95556	7.52799	7.786615	7.370571	7.786615	7.370571	7.840138	7.419553	5.853672	5.535075	7.95556	7.52799	7.95556	7.52799
380450	3742350	9.444651	9.144328	12.74806	12.34425	12.74806	12.34425	12.52768	12.1309	12.52768	12.1309	12.65457	12.25322	9.444651	9.144328	12.74806	12.34425	12.74806	12.34425
380950	3742350	9.385941	8.89886	12.66673	12.01423	12.66673	12.01423	12.44651	11.80597	12.44651	11.80597	12.57318	11.9244	9.385941	8.89886	12.66673	12.01423	12.66673	12.01423
381450	3742350	9.289386	8.948022	12.53858	12.07999	12.53858	12.07999	12.31926	11.86869	12.31926	11.86869	12.44364	11.98769	9.289386	8.948022	12.53858	12.07999	12.53858	12.07999
381950	3742350	9.106563	8.753836	12.29487	11.82087	12.29487	11.82087	12.07798	11.61177	12.07798	11.61177	12.19847	11.72668	9.106563	8.753836	12.29487	11.82087	12.29487	11.82087
382450	3742350	8.865085	8.513157	11.97272	11.49927	11.97272	11.49927	11.75944	11.29475	11.75944	11.29475	11.87497	11.40508	8.865085	8.513157	11.97272	11.49927	11.97272	11.49927
382950	3742350	8.72591	8.316821	11.78687	11.2373	11.78687	11.2373	11.57522	11.03544	11.57522	11.03544	11.68788	11.14169	8.72591	8.316821	11.78687	11.2373	11.78687	11.2373
383450	3742350	8.383144	8.140457	11.32947	11.00162	11.32947	11.00162	11.12397	10.8017	11.12397	10.8017	11.22982	10.90438	8.383144	8.140457	11.32947	11.00162	11.32947	11.00162
383950	3742350	8.146338	7.767225	11.01397	10.50458	11.01397	10.50458	10.8115	10.31119	10.8115	10.31119	10.91226	10.40605	8.146338	7.767225	11.01397	10.50458	11.01397	10.50458
384450	3742350	7.815281	7.534084	10.57113	10.1935	10.57113	10.1935	10.37441	10.00339	10.37441	10.00339	10.46891	10.09343	7.815281	7.534084	10.57113	10.1935	10.57113	10.1935
384950	3742350	7.400231	7.066375	10.01676	9.569566	10.01676	9.569566	9.828393	9.389345	9.828393	9.389345	9.914985	9.470248	7.400231	7.066375	10.01676	9.569566	10.01676	9.569566
385450	3742350	7.21674	6.888565	9.771802	9.332016	9.771802	9.332016	9.584761	9.153108	9.584761	9.153108	9.667421	9.230266	7.21674	6.888565	9.771802	9.332016	9.771802	9.332016
385950	3742350	6.947834	6.782398	9.412469	9.189557	9.412469	9.189557	9.230689	9.012176	9.230689	9.012176	9.308227	9.087441	6.947834	6.782398	9.412469	9.189557	9.412469	9.189557
386450	3742350	6.806099	6.629346	9.225061	8.986977	9.225061	8.986977	9.043991	8.810075	9.043991	8.810075	9.117791	8.881327	6.806099	6.629346	9.225061	8.986977	9.225061	8.986977
386950	3742350	6.622683	6.37371	8.97996	8.645194	8.97996	8.645194	8.801306	8.473236	8.801306	8.473236	8.871436	8.539698	6.622683	6.37371	8.97996	8.645194	8.97996	8.645194
387450	3742350	6.391945	6.061901	8.672582	8.229772	8.672582	8.229772	8.498035	8.063869	8.498035	8.063869	8.563377	8.12396	6.391945	6.061901	8.672582	8.229772	8.672582	8.229772
387950	3742350	6.188001	5.968142	8.401294	8.104309	8.401294	8.104309	8.229595	7.940199	8.229595	7.940199	8.29042	7.998552	6.188001	5.968142	8.401294	8.104309	8.401294	8.104309
388950	3742350	5.976304	5.704493	8.117631	7.751531	8.117631	7.751531	7.949406	7.591836	7.949406	7.591836	8.006387	7.645226	5.976304	5.704493	8.117631	7.751531	8.117631	7.751531
389450	3742350	5.821698	5.490406	7.910326	7.466109	7.910326	7.466109	7.744487	7.311055	7.744487	7.311055	7.798702	7.36021	5.821698	5.490406	7.910326	7.466109	7.910326	7.466109
380200	3731100	12.169	11.85955	16.48599	16.06098	16.48599	16.06098	16.22029	15.80054	16.22029	15.80054	16.36453	15.94297	12.169	11.85955	16.48599	16.06098	16.48599	16.06098
380700	3731100	15.00624	14.74396	20.26639	19.9048	20.26639	19.9048	19.92635	19.56876	19.92635	19.56876	20.12544	19.76674	15.00624	14.74396	20.26639	19.9048	20.26639	19.9048
380200	3731600	14.19387	13.7263	19.18164	18.54688	19.18164	18.54688	18.86561	18.23966	18.86561	18.23966	19.05016	18.41906	14.19387	13.7263	19.18164	18.54688	19.18164	18.54688
380700	3731600	16.8915	16.25433	22.77339	21.91308	22.77339	21.91308	22.38761	21.53991	22.38761	21.53991	22.62541	21.76897	16.8915	16.25433	22.77339	21.91308	22.77339	21.91308
381200	3731600	18.86121	18.21666	25.37955	24.51138	25.37955	24.51138	24.94083	24.08634	24.94083	24.08634	25.22337	24.35924	18.86121	18.21666	25.37955	24.51138	25.37955	24.51138
381700	3731600	21.70771	21.22399	29.16669	28.51385	29.16669	28.51385	28.65448	28.01388	28.65448	28.01388	28.99414	28.34715	21.70771	21.22399	29.16669	28.51385	29.16669	28.51385
383700	3731600	18.43256	18.20101	24.83509	24.51812	24.83509	24.51812	24.27538	23.96654	24.27538	23.96654	24.51858	24.20867	18.43256	18.20101	24.83509	24.51812	24.83509	24.51812
384200	3731600	17.25165	16.62738	23.26906	22.42666	23.26906	22.42666	22.71006	21.88892	22.71006	21.88892	22.92276	22.09436	17.25165	16.62738	23.26906	22.42666	23.26906	22.42666
380200	3732100	14.99918	14.65736	20.24883	19.78196	20.24883	19.78196	19.91179	19.45104	19.91179	19.45104	20.11415	19.65056	14.99918	14.65736	20.24883	19.78196	20.24883	19.78196
380700	3732100	17.80068	17.14852	23.97756	23.10044	23.97756	23.10044	23.56797	22.70441	23.56797	22.70441	23.82611	22.95231	17.80068	17.14852	23.97756	23.10044	23.97756	23.10044
381200	3732100	20.06849	19.45328	26.98395	26.15724	26.98395	26.15724	26.51412	25.70184	26.51412	25.70184	26.82153	25.99957	20.06849	19.45328	26.98395	26.15724	26.98395	26.15724
381700	3732100	22.54349	22.1034	30.27566	29.68194	30.27566	29.68194	29.74023	29.15665	29.74023	29.15665	30.09751	29.50795	22.54349	22.1034	30.27566	29.68194	30.27566	29.68194
382700	3732100	22.17561	21.8238	29.79943	29.3228	29.79943	29.3228	29.2294	28.7619	29.2294	28.7619	29.56743	29.09768	22.17561	21.8238	29.79943	29.3228	29.79943	29.3228
383700	3732100	16.33858	15.98027	22.03546	21.54812	22.03546	21.54812	21.53961	21.06519	21.53961	21.06519	21.74726	21.27016	16.33858	15.98027	22.03546	21.54812	22.03546	21.54812
380200	3732600	16.28134	15.758	21.95206	21.24748	21.95206	21.24748	21.57999	20.88763	21.57999	20.88763	21.80873	21.10869	16.28134	15.758	21.95206	21.24748	21.95206	21.24748
380700	3732600	18.36547	17.85868	24.72316	24.04242	24.72316	24.04242	24.29631	23.62781	24.29631	23.62781	24.5676	23.891	18.36547	17.85868	24.72316	24.04242	24.72316	24.04242
381200	3732600	20.94178	20.24156	28.14377	27.20488	28.14377	27.20488	27.65069	26.72747	27.65069	26.72747	27.97632	27.04122	20.94178	20.24156	28.14377	27.20488	28.14377	27.20488
381700	3732600	24.27082	22.62938	32.57481	30.38179	32.57481	30.38179	31.99945	29.8422	31.99945	29.8422	32.39148	30.20396	24.27082	22.79908	32.57481	30.38179	32.57481	30.38179
383700	3732600	14.57702	14.25028	19.67931	19.22278	19.67931	19.22278	19.23926	18.79359	19.23926	18.79359	19.41769	18.97045	14.57702	14.25028	19.67931	19.22278	19.67931	19.22278
384200	3732600	13.67022	13.14242	18.47214	17.74213	18.47214	17.74213	18.04447	17.33236	18.04447	17.33236	18.20324	17.48599	13.67022	13.14242	18.47214	17.74213	18.47214	17.74213

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
384700	3732600	13.02483	12.35158	17.61004	16.69937	17.61004	16.69937	17.20105	16.31023	17.20105	16.31023	17.34836	16.44987	13.02483	12.35158	17.61004	16.69937	17.61004	16.69937
385200	3732600	12.37451	11.8602	16.74045	16.042	16.74045	16.042	16.35135	15.66688	16.35135	15.66688	16.48768	15.79818	12.37451	11.8602	16.74045	16.042	16.74045	16.042
380200	3733100	16.70459	16.21081	22.51019	21.84441	22.51019	21.84441	22.12693	21.47242	22.12693	21.47242	22.36603	21.7041	16.70459	16.21081	22.51019	21.84441	22.51019	21.84441
380700	3733100	19.04049	18.09232	25.61856	24.34946	25.61856	24.34946	25.17471	23.92669	25.17471	23.92669	25.46051	24.19562	19.04049	18.09232	25.61856	24.34946	25.61856	24.34946
381200	3733100	22.43259	21.74871	30.13273	29.15452	30.13273	29.15452	29.60469	28.64425	29.60469	28.64425	29.95892	28.98628	22.43259	21.74871	30.13273	29.15452	30.13273	29.15452
381700	3733100	26.0399	24.58336	34.92746	32.97793	34.92746	32.97793	34.30822	32.39158	34.30822	32.39158	34.73695	32.79443	26.0399	24.58336	34.92746	32.97793	34.92746	32.97793
382200	3733100	22.94609	21.38282	30.804	28.71154	30.804	28.71154	30.24106	28.18396	30.24106	28.18396	30.60646	28.52165	22.94776	21.3856	30.804	28.71154	30.804	28.71154
382700	3733100	17.73334	16.6022	23.86593	22.34801	23.86593	22.34801	23.40199	21.90954	23.40199	21.90954	23.6578	22.14677	17.73334	16.6022	23.86593	22.34801	23.86593	22.34801
383200	3733100	14.71169	14.01462	19.84597	18.9046	19.84597	18.9046	19.43142	18.50762	19.43142	18.50762	19.62177	18.68898	14.71169	14.01462	19.84597	18.9046	19.84597	18.9046
384700	3733100	11.93403	11.51507	16.14641	15.57642	16.14641	15.57642	15.77591	15.21966	15.77591	15.21966	15.90748	15.34788	11.93403	11.51507	16.14641	15.57642	16.14641	15.57642
385200	3733100	11.56486	11.13893	15.65249	15.07419	15.65249	15.07419	15.29259	14.72417	15.29259	14.72417	15.4179	14.845	11.56486	11.13893	15.65249	15.07419	15.65249	15.07419
380200	3733600	16.96115	16.46817	22.8467	22.18097	22.8467	22.18097	22.45573	21.80107	22.45573	21.80107	22.70151	22.04036	16.96115	16.46817	22.8467	22.18097	22.8467	22.18097
380700	3733600	19.86544	19.28478	26.57209	25.81221	26.57209	25.81221	26.11159	25.36548	26.11159	25.36548	26.414	25.65956	19.86544	19.28478	26.57209	25.81221	26.57209	25.81221
381200	3733600	23.62056	23.02416	31.71192	30.90885	31.71192	30.90885	31.15431	30.36705	31.15431	30.36705	31.53296	30.73735	23.62056	23.02416	31.71192	30.90885	31.71192	30.90885
381700	3733600	27.59913	26.7409	36.99322	35.83871	36.99322	35.83871	36.34241	35.2062	36.34241	35.2062	36.8071	35.65759	27.59913	26.7409	36.99322	35.83871	36.99322	35.83871
382200	3733600	21.64288	20.99272	29.06208	28.18541	29.06208	28.18541	28.52923	27.66791	28.52923	27.66791	28.87086	28.00034	21.64288	20.99272	29.06208	28.18541	29.06208	28.18541
382700	3733600	16.67139	15.77955	22.44362	21.24532	22.44362	21.24532	22.00838	20.82943	22.00838	20.82943	22.24652	21.05323	16.67139	15.77955	22.44362	21.24532	22.44362	21.24532
383200	3733600	14.02091	13.42064	18.91684	18.10603	18.91684	18.10603	18.52655	17.73017	18.52655	17.73017	18.70778	17.90362	14.02091	13.42064	18.91684	18.10603	18.91684	18.10603
383700	3733600	12.76121	12.15468	17.23988	16.42063	17.23988	16.42063	16.86995	16.06528	16.86995	16.06528	17.02421	16.2117	12.76121	12.15468	17.23988	16.42063	17.23988	16.42063
384200	3733600	11.67403	11.30192	15.79137	15.28434	15.79137	15.28434	15.44069	14.94428	15.44069	14.94428	15.57245	15.07311	11.67403	11.30192	15.79137	15.28434	15.79137	15.28434
384700	3733600	11.0318	10.72002	14.934	14.50881	14.934	14.50881	14.59568	14.17996	14.59568	14.17996	14.71493	14.29697	11.0318	10.72002	14.934	14.50881	14.934	14.50881
388700	3733600	8.991735	8.59127	12.19837	11.65325	12.19837	11.65325	11.91216	11.37951	11.91216	11.37951	11.99813	11.46228	8.991735	8.59127	12.19837	11.65325	12.19837	11.65325
389200	3733600	8.693859	8.361741	11.79893	11.34621	11.79893	11.34621	11.52292	11.07953	11.52292	11.07953	11.60446	11.15848	8.693859	8.361741	11.79893	11.34621	11.79893	11.34621
380200	3734100	17.59618	16.99177	23.68617	22.87062	23.68617	22.87062	23.28108	22.47951	23.28108	22.47951	23.54202	22.7322	17.59618	16.99177	23.68617	22.87062	23.68617	22.87062
380700	3734100	20.95039	20.0946	28.15129	27.00274	28.15129	27.00274	27.66116	26.53367	27.66114	26.53367	27.98892	26.84761	20.95039	20.0946	28.15129	27.00274	28.15129	27.00274
381200	3734100	25.96232	25.30996	34.81908	33.94361	34.81908	33.94361	34.20952	33.34963	34.20952	33.34963	34.63974	33.7693	25.96232	25.30996	34.81908	33.94361	34.81908	33.94361
383200	3734100	13.76996	13.17745	18.58192	17.77866	18.58192	17.77866	18.20041	17.42029	18.20041	17.42029	18.37733	17.58085	13.76996	13.17745	18.58192	17.77866	18.58192	17.77866
383700	3734100	12.38149	11.83575	16.72836	15.99473	16.72836	15.99473	16.37429	15.65478	16.37429	15.65478	16.52419	15.79651	12.38149	11.83575	16.72836	15.99473	16.72836	15.99473
385700	3734100	10.08529	9.563136	13.66462	12.96083	13.66462	12.96083	13.35284	12.66172	13.35284	12.66172	13.45709	12.75867	10.08529	9.563136	13.66462	12.96083	13.66462	12.96083
388200	3734100	9.188594	8.770698	12.46811	11.90017	12.46811	11.90017	12.17213	11.61886	12.17213	11.61886	12.25845	11.70177	9.188594	8.770698	12.46811	11.90017	12.46811	11.90017
389700	3734100	8.325828	7.902872	11.30744	10.73249	11.30744	10.73249	11.04345	10.4833	11.04345	10.4833	11.11866	10.55511	8.325828	7.902872	11.30744	10.73249	11.30744	10.73249
380200	3734600	18.26128	17.76491	24.5662	23.89492	24.5662	23.89492	24.14373	23.48463	24.14373	23.48463	24.41982	23.75459	18.26128	17.76491	24.5662	23.89492	24.5662	23.89492
380700	3734600	22.09131	21.66653	29.66471	29.09009	29.66471	29.09009	29.1501	28.58542	29.1501	28.58542	29.50333	28.93332	22.09131	21.66653	29.66471	29.09009	29.66471	29.09009
381200	3734600	27.66249	26.98413	37.07996	36.16442	37.07996	36.16442	36.43544	35.53667	36.43544	35.53667	36.90178	35.99202	27.66249	26.98413	37.07996	36.16442	37.07996	36.16442
381700	3734600	29.03769	28.35757	38.88598	37.98663	38.88598	37.98663	38.21868	37.3236	38.21868	37.3236	38.71628	37.8102	29.03769	28.35757	38.89933	37.98714	38.89933	37.98714
382700	3734600	15.26586	14.54669	20.56251	19.59931	20.56251	19.59931	20.16637	19.22004	20.16637	19.22004	20.38076	19.42206	15.26586	14.54669	20.56251	19.59931	20.56251	19.59931
383200	3734600	12.8891	12.52112	17.3939	16.89652	17.3939	16.89652	17.04354	16.5575	17.04354	16.5575	17.21005	16.71971	12.8891	12.52112	17.3939	16.89652	17.3939	16.89652
383700	3734600	11.94406	11.47952	16.14231	15.51644	16.14231	15.51644	15.80463	15.19379	15.80463	15.19379	15.94808	15.33126	11.94406	11.47952	16.14231	15.51644	16.14231	15.51644
384700	3734600	10.25986	10.02757	13.89069	13.57321	13.89069	13.57321	13.58847	13.27675	13.58847	13.27675	13.70075	13.38741	10.25986	10.02757	13.89069	13.57321	13.89069	13.57321
387700	3734600	8.83711	8.541579	11.99716	11.6155	11.99716	11.6155	11.71444	11.34181	11.71444	11.34181	11.79557	11.42205	8.83711	8.541579	11.99716	11.6155	11.99716	11.6155
388700	3734600	8.521393	7.996442	11.56967	10.85816	11.56967	10.85816	11.2952	10.60638	11.2952	10.60638	11.37272	10.67961	8.521393	7.996442	11.56967	10.85816	11.56967	10.85816
389200	3734600	8.120797	7.795934	11.03039	10.58869	11.03039	10.58869	10.77322	10.34145	10.77322	10.34145	10.84612	10.41154	8.120797	7.795934	11.03039	10.58869	11.03039	10.58869
389700	3734600	7.913076	7.679162	10.75275	10.43138	10.75275	10.43138	10.50206	10.18824	10.50206	10.18824	10.57143	10.25686	7.913076	7.679162	10.75275	10.43138	10.75275	10.43138
380200	3735100	19.40487	18.27191	26.08348	24.56489	26.08348	24.56489	25.63446	24.14141	25.63446	24.14141	25.93552	24.42322	19.40487	18.27191	26.08348	24.56489	26.08348	24.56489
380700	3735100	22.87807	21.99905	30.70317	29.52452	30.70317	29.52452	30.17121	29.0138	30.17121	29.0138	30.54374	29.37167	22.87807	21.99905	30.70317	29.52452	30.70317	29.52452
381200	3735100	26.56631	25.75426	35.6104	34.523	35.6104	34.523	34.99079	33.92228	34.99079	33.92228	35.4386	34.356	26.56631	25.75426	35.6104	34.523	35.6104	34.523
381700	3735100	27.69002	26.72665	37.0975	35.80824	37.0975	35.80824	36.45766	35.18285	36.45766	35.18285	36.93088	35.63916	27.69564	26.72678	37.10425	35.80843	37.10313	35.80843
383200	3735100	12.91342	12.3267	17.42473	16.61518	17.42473	16.61518	17.0804	16.30645	17.0804	16.30645	17.24791	16.46503	12.91342	12.3267	17.42679	16.63819	17.42679	16.63819
383700	3735100	11.79559	11.26372	15.93586	15.21896	15.93586	15.21896	15.61026	14.90707	15.61026	14.90707	15.75532	15.0462	11.79559	11.26372	15.93586	15.21896	15.93586	15.21896
384700	3735100	9.952143	9.674366	13.4744	13.09603	13.4744	13.09603	13.18654	12.81426	13.18654	12.81426	13.29619	12.92136	9.952143	9.674366	13.4744	13.09603	13.4744	13.09603
387700	3735100	8.464234	8.093981	11.49423	10.99188	11.49423	10.99188	11.22549	10.73483	11.22549	10.73483	11.30233	10.80813	8.464234	8.093981	11.49423	10.99188	11.49423	10.99188
388700	3735100	8.106938	7.8427	11.01706	10.65592	11.01706	10.65592	10.75853	10.40645	10.75853	10.40645	10.83045	10.47742	8.106938	7.8427	11.01706	10.65592	11.01706	10.65592
389200	3735100	7.811006	7.492935	10.61326	10.1798	10.61326	10.1798	10.36549	9.945198	10.36549	9.945198	10.43419	10.01207	7.811006	7.492935	10.61326	10.1798	10.61326	10.1798
389700	3735100	7.559995	7.271527	10.27602	9.882056	10.27602	9.882056	10.03748	9.652723	10.03748	9.652723	10.10279	9.71624	7.559995	7.271527	10.27602	9.882056	10.27602	9.882056
380200	3735600	19.17682	18.67039	25.76352	25.08257	25.76352	25.08257	25.3209	24.65095	25.3209	24.65095	25.62357	24.9458	19.17682	18.67039	25.76352	25.08257	25.76352	25.08257
380700	3735600	21.38238	20.95226	28.69358	28.11459	28.69358	28.11459	28.19774	27.62861	28.19774	27.62861	28.54695	27.97136	21.38238	20.95226	28.69358	28.11459	28.69358	28.11459
381200	3735600	24.00495	23.52751	32.18622	30.84783	32.18622	30.84783	31.62816	30.30424	31.62816	30.29851	32.02972	30.69544	24.00495	23.52751	32.18622	30.84783	32.18622	30.84783
381700	3735600	25.78566	24.8484	34.55692	33.30005	34.55692	33.30005	33.95362	32.71752	33.95362	32.71752	34.39046	33.13869	25.78566	24.8484	34.55692	33.30005	34.55692	33.30005
382700	3735600	19.15267	17.38225	25.72308	23.35751	25.72308	23.35751	25.25349	22.86383	25.25349	22.86038	25.55419	23.19473	19.15267	17.38225	25.72308	23.35751	25.72308	23.35751
383200	3735600	13.89371	13.03601	18.71992	17.56999	18.71992	17.56999	18.36076	17.23061	18.34856	17.23061	18.55403	17.40946	13.89371	13.03601	18.71992	17.56999	18.71992	17.56999
383700	3735600	12.02454	11.1599	16.23095	15.07177	16.23095	15.07177	15.9075	14.76952	15.9075	14.76952	16.06202	14.90962	12.02454	11.1599	16.23095	15.07177	16.23095	15.07177
384200	3735600	10.70343	10.40433	14.47237	14.0494	14.47237	14.0494	14.19496	13.83824	14.19496	13.83824	14.32232	13.96333	10.71797	10.45136	14.49174	14.12844	14.47237	14.12844
384700	3735600	10.06564	9.735839	13.62359	13.17603	13.62359	13.17603	13.338	12.89779	13.338	12.89779	13.45144	13.00761	10.06564	9.735839	13.62359	13.17603	13.62359	13.17603
385200	3735600	9.557356	9.165143	12.94594	12.41431	12.94594	12.41431	12.6667	12.14661	12.6667	12.14661	12.76932	12.24517	9.557356	9.165143	12.94594	12.41431	12.94594	12.41431
385700	3735600	9.043032	8.744985	12.25875	11.8547	12.25875	11.8547	11.9891	11.59329	11.9891	11.59329	12.08185	11.6829	9.043032	8.744985	12.25875	11.8547	12.25875	11.8547
386700	3735600	8.637876	8.270006	11.72338	11.22387	11.72338	11.22387	11.45658	10.96916	11.45658	10.96916	11.53861	11.0479	8.637876	8.270006	11.72338	11.22387	11.72338	11.22387
388200	3735600	7.835817	7.528432	10.64669	10.22702	10.64669	10.22702	10.39953	9.989458	10.39953	9.989458	10.46879	10.05672	7.835817	7.528432	10.64669	10.22702	10.64669	10.22702
388700	3735600	7.801962	7.551145	10.60559	10.25916	10.60559	10.25916	10.35803	10.02	10.35803	10.02	10.42496	10.08686	7.801962	7.551145	10.60559	10.25916	10.60559	10.25916
389200	3735600	7.651638	7.261272	10.42063	9.872533	10.42063	9.872533	10.17651	9.64567	10.17651	9.64567	10.24279	9.709624	7.651638	7.261272	10.42063	9.872533	10.42063	9.872533
380200	3736100	18.53146	17.78112	24.89676	23.88868	24.89676	23.88868	24.46996	23.47733	24.46996	23.47733	24.76246	23.75778	18.53146	17.78112	24.89676	23.88868	24.89676	23.88868
380700	3736100	20.74971	20.37799	27.85067	27.34669	27.85067	27.34669	27.36885	26.87404	27.36885	26.87404	27.70529	27.20649	20.74971	20.37799	27.85067	27.34669	27.85067	27.34669
381200	3736100	22.08624	21.29958	29.62817	28.57274	29.62817	28.57274	29.11249	28.06315	29.11249	27.95725	29.47628	28.42568	22.08624	21.29958	29.62817	28.57274	29.62817	28.57274
381700	3736100	23.48785	22.58517	31.49278	30.28146	31.49278	30.28146	30.9416	29.75011	30.9416	29.75011	31.33366	30.12725	23.48785	22.58517	31.49278	30.28146	31.49278	30.28146
382200	3736100	22.63002	21.8537	30.34898	29.30651	30.34898	29.30651	29.81126	28.78716	29.81126	28.78716	30.18565	29.14913	22.63002	21.8537	30.34898	29.30651	30.34898	29.30651
382700	3736100	18.82071	17.33436	25.27569	23.28866	25.27569	23.28866	24.81729	22.8638	24.81729	22.8638	25.11391	23.13328	18.82071	17.33436	25.27569	23.28866	25.27569	23.28866
383700	3736100	12.34271	11.66987	16.64921	15.74548	16.64921	15.74548	16.32393	15.43815	16.32393	15.43815	16.4876	15.59157	12.34271	11.66987	16.64921	15.74548	16.64921	15.74548
384200	3736100	10.85483	10.12183	14.66748	13.68396	14.66748	13.68396	14.37292	13.40647	14.37292	13.40647	14.50629	13.52783	10.85483	10.12183	14.66748	13.68396	14.66748	13.68396
384700	3736100	9.958838	9.599146	13.47397	12.98732	13.47397	12.98732	13.19692	12.80178	13.19692	12.80178	13.31189	12.91355	9.958838	9.663006	13.47397	13.07236	13.47397	13.07236
385200	3736100	9.407422	9.020548	12.74003	12.21579	12.74003	12.21579	12.46994	11.95657	12.46994	11.95657	12.57275	12.05524	9.407422	9.020548	12.74003	12.21579	12.74003	12.21579
385700	3736100	8.798797	8.510432	11.92599	11.53442	11.92599	11.53442	11.66865	11.28365	11.66865	11.28365	11.76033	11.37229	8.798797	8.510432	11.92599	11.53442	11.92599	11.53442
386200	3736100	8.424782	8.213038	11.42675	11.13875	11.42675	11.13875	11.1741	10.89214	11.1741	10.89214	11.25805	10.97423	8.424782	8.213038	11.42675	11.13875	11.42675	11.13875
386700	3736100	8.439412	8.062878	11.45188	10.94217	11.45188	10.94217	11.1939	10.69704	11.1939	10.69704	11.27528	10.77455	8.439412	8.062878	11.45188	10.94217	11.45188	10.94217
387700	3736100	7.844809	7.597488	10.6567	10.32036	10.6567	10.32036	10.41138	10.08297	10.41138	10.08297	10.48185	10.1514	7.844809	7.597488	10.6567	10.32036	10.6567	10.32036
388200	3736100	7.671677	7.403269	10.42652	10.06085	10.42652	10.06085	10.18462	9.829377	10.18462	9.829377	10.25139	9.894444	7.671677	7.403269	10.42652	10.06085	10.42652	10.06085
388700	3736100	7.45385	7.105897	10.13234	9.659388	10.13234	9.659388	9.897475	9.437476	9.897475	9.437476	9.961698	9.498997	7.45385	7.105897	10.13234	9.659388	10.13234	9.659388
389700	3736100	6.930801	6.635651	9.424274	9.022966	9.424274	9.022966	9.208049	8.81897	9.208049	8.81897	9.26703	8.875915	6.930801	6.635651	9.424274	9.022966	9.424274	9.022966
380200	3736600	18.0599	17.60297	24.26756	23.64969	24.26756	23.64969	23.84992	23.24193	23.84992	23.24193	24.13316	23.51922	18.0599	17.60297	24.26756	23.64969	24.26756	23.64969

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
380700	3736600	19.37197	18.91477	26.00716	25.29249	26.00716	25.29249	25.55869	24.85465	25.55869	24.85465	25.86449	25.15509	19.37197	18.91477	26.00716	25.29249	26.00716	25.29249
381200	3736600	21.1954	20.52115	28.44832	27.53947	28.44832	27.53947	27.95229	27.05797	27.95229	27.05797	28.29571	27.39165	21.1954	20.52115	28.44832	27.53947	28.44832	27.53947
381700	3736600	21.38541	20.41103	28.68783	27.38259	28.68783	27.38259	28.18536	26.90187	28.18536	26.90187	28.53713	27.23678	21.38541	20.41103	28.68783	27.38259	28.68783	27.38259
382200	3736600	20.36052	19.63501	27.32293	26.34995	27.32293	26.34995	26.83801	25.88113	26.83801	25.88113	27.16819	26.19918	20.36052	19.63501	27.32293	26.34995	27.32293	26.34995
382700	3736600	17.76213	16.30674	23.86138	21.91626	23.86138	21.91626	23.42904	21.51839	23.42904	21.51839	23.7063	21.76911	17.76213	16.30674	23.86138	21.91626	23.86138	21.91626
384200	3736600	10.9605	10.32042	14.80003	13.94146	14.80003	13.94146	14.50823	13.66554	14.50823	13.66554	14.64754	13.79444	10.9605	10.32042	14.80003	13.94146	14.80003	13.94146
384700	3736600	9.819356	9.224407	13.28095	12.48208	13.28095	12.48208	13.01215	12.22748	13.01215	12.22748	13.12779	12.33364	9.819356	9.224407	13.28095	12.48208	13.28095	12.48208
385200	3736600	9.098156	8.762737	12.32028	11.86651	12.32028	11.86651	12.06301	11.61856	12.06301	11.61856	12.16341	11.71507	9.098156	8.762737	12.32028	11.86651	12.32028	11.86651
385700	3736600	8.599321	8.389351	11.65477	11.36859	11.65477	11.36859	11.40695	11.12592	11.40695	11.12592	11.49745	11.21465	8.599321	8.389351	11.65477	11.36859	11.65477	11.36859
386200	3736600	8.223511	7.968186	11.15297	10.80759	11.15297	10.80759	10.91016	10.57279	10.91016	10.57279	10.993	10.6528	8.223511	7.968186	11.15297	10.80759	11.15297	10.80759
386700	3736600	7.952424	7.71167	10.79165	10.46618	10.79165	10.46618	10.55213	10.23509	10.55213	10.23509	10.62915	10.30953	7.952424	7.71167	10.79165	10.46618	10.79165	10.46618
387200	3736600	7.807511	7.580458	10.60112	10.29291	10.60112	10.29291	10.36374	10.0632	10.36374	10.0632	10.43677	10.13421	7.807511	7.580458	10.60112	10.29291	10.60112	10.29291
387700	3736600	7.666329	7.443281	10.41462	10.11149	10.41462	10.11149	10.17719	9.881381	10.17719	9.881381	10.24631	9.948587	7.666329	7.443281	10.41462	10.11149	10.41462	10.11149
388200	3736600	7.542338	7.303633	10.24983	9.92589	10.24983	9.92589	10.01507	9.698766	10.01507	9.698766	10.08155	9.762998	7.542338	7.303633	10.24983	9.92589	10.24983	9.92589
388700	3736600	7.299723	7.063149	9.924493	9.602643	9.924493	9.602643	9.696459	9.383054	9.696459	9.383054	9.75906	9.443877	7.299723	7.063149	9.924493	9.602643	9.924493	9.602643
389200	3736600	7.064279	6.816975	9.607509	9.269767	9.607509	9.269767	9.386745	9.057336	9.386745	9.057336	9.446151	9.115289	7.064279	6.816975	9.607509	9.269767	9.607509	9.269767
389700	3736600	6.936063	6.567937	9.434606	8.934136	9.434606	8.934136	9.216216	8.732142	9.216216	8.732142	9.273755	8.787301	6.936063	6.567937	9.434606	8.934136	9.434606	8.934136
380200	3737100	17.50724	16.94015	23.52915	22.76363	23.52915	22.76363	23.12465	22.37235	23.12465	22.37235	23.39769	22.63781	17.50724	16.94015	23.52915	22.76363	23.52915	22.76363
380700	3737100	18.35537	17.63286	24.66506	23.68966	24.66506	23.68966	24.2387	23.10902	24.2387	23.10902	24.52618	23.55568	18.35537	17.63286	24.66506	23.68966	24.66506	23.68966
381200	3737100	19.60374	19.20502	26.32232	25.78123	26.32232	25.78123	25.86241	25.33011	25.86241	25.33011	26.17607	25.63937	19.60374	19.20502	26.32232	25.78123	26.32232	25.78123
381700	3737100	18.76121	18.14718	25.18478	24.36039	25.18478	24.36039	24.7442	23.93332	24.7442	23.93332	25.04647	24.22563	18.76121	18.14718	25.18478	24.36039	25.18478	24.36039
382200	3737100	18.51678	17.55273	24.86255	23.57149	24.86255	23.57149	24.42142	23.15162	24.42142	23.15162	24.71661	23.42992	18.52085	17.55364	24.86255	23.57149	24.86255	23.57149
382700	3737100	16.35928	15.54193	21.98788	20.8934	21.98788	20.8934	21.5912	20.51461	21.5912	20.51461	21.84276	20.75183	16.35928	15.54193	21.98788	20.8934	21.98788	20.8934
383200	3737100	14.14092	13.23795	19.03381	17.82531	19.03381	17.82531	18.6816	17.49458	18.6816	17.49458	18.88748	17.68456	14.14092	13.23795	19.03381	17.82531	19.03381	17.82531
383700	3737100	12.60385	11.57347	16.98643	15.60869	16.98643	15.60869	16.66507	15.31197	16.66507	15.31197	16.83944	15.46794	12.60385	11.57347	16.98643	15.60869	16.98643	15.60869
384200	3737100	11.14758	10.6389	15.04365	14.3617	15.04365	14.3617	14.75179	14.08328	14.75179	14.08328	14.89761	14.22076	11.14758	10.6389	15.04365	14.3617	15.04365	14.3617
384700	3737100	9.887682	9.426382	13.36551	12.74613	13.36551	12.74613	13.0996	12.49151	13.0996	12.49151	13.21967	12.60427	9.887682	9.426382	13.36551	12.74613	13.36551	12.74613
385200	3737100	9.002903	8.585594	12.18776	11.62637	12.18776	11.62637	11.93709	11.38634	11.93709	11.38634	12.03837	11.48149	9.002903	8.585594	12.18776	11.62637	12.18776	11.62637
387700	3737100	7.560529	7.312508	10.26915	9.932422	10.26915	9.932422	10.03706	9.708998	10.03706	9.708998	10.10619	9.775969	7.560529	7.312508	10.26915	9.932422	10.26915	9.932422
388200	3737100	7.129039	6.910901	9.688319	9.392047	9.688319	9.392047	9.468755	9.180473	9.468755	9.180473	9.531902	9.241846	7.129039	6.910901	9.688319	9.392047	9.688319	9.392047
388700	3737100	7.11697	6.861978	9.675382	9.329349	9.675382	9.329349	9.453635	9.118175	9.453635	9.118175	9.515001	9.177541	7.11697	6.861978	9.675382	9.329349	9.675382	9.329349
389200	3737100	6.99496	6.737396	9.514117	9.163244	9.514117	9.163244	9.294984	8.955441	9.294984	8.955441	9.353425	9.012446	6.99496	6.737396	9.514117	9.163244	9.514117	9.163244
389700	3737100	6.850128	6.604386	9.320377	8.983824	9.320377	8.983824	9.106422	8.77793	9.106422	8.77793	9.162555	8.832894	6.850128	6.604386	9.320377	8.983824	9.320377	8.983824
380200	3737600	16.4178	16.08404	22.07349	21.62036	22.07349	21.62036	21.69433	21.24791	21.69433	21.24791	21.94723	21.4972	16.4178	16.08404	22.07349	21.62036	22.07349	21.62036
380700	3737600	17.0731	16.38192	22.95227	22.01842	22.95227	22.01842	22.55545	21.63588	22.55545	21.63588	22.81892	21.8902	17.0731	16.38192	22.95227	22.01842	22.95227	22.01842
381200	3737600	18.03114	17.26313	24.21681	23.18718	24.21681	23.18718	23.79435	22.78195	23.79435	22.78195	24.08067	23.05531	18.03114	17.26313	24.21681	23.18718	24.21681	23.18718
381700	3737600	17.64457	16.97981	23.69892	22.80655	23.69892	22.80655	23.28168	22.40499	23.28168	22.40499	23.56076	22.67334	17.64457	16.97981	23.69892	22.80655	23.69892	22.80655
382200	3737600	16.88853	15.81273	22.69053	21.25143	22.69053	21.25143	22.28794	20.87253	22.28794	20.87253	22.55198	21.11722	16.88853	15.81273	22.69053	21.25143	22.69053	21.25143
382700	3737600	15.19494	14.31021	20.43337	19.24962	20.43337	19.24962	20.06441	18.90106	20.06441	18.90106	20.29414	19.11503	15.19494	14.31021	20.43337	19.24962	20.43337	19.24962
383200	3737600	13.37297	12.56677	18.00614	16.92754	18.00614	16.92754	17.67398	16.61433	17.67398	16.61433	17.86664	16.7926	13.37297	12.56677	18.00614	16.92754	18.00614	16.92754
383700	3737600	12.17121	11.44408	16.40508	15.43166	16.40508	15.43166	16.0963	15.1405	16.0963	15.1405	16.26431	15.29599	12.17121	11.44408	16.40508	15.43166	16.40508	15.43166
384200	3737600	10.86906	10.02681	14.66921	13.54275	14.66921	13.54275	14.38635	13.28056	14.38635	13.28056	14.52824	13.40749	10.86906	10.02681	14.66921	13.54275	14.66921	13.54275
384700	3737600	9.944737	9.438391	13.43574	12.75628	13.43574	12.75628	13.1722	12.50488	13.1722	12.50488	13.29612	12.62058	9.944737	9.438391	13.43574	12.75628	13.43574	12.75628
385200	3737600	9.089382	8.692133	12.29719	11.76233	12.29719	11.76233	12.04869	11.52357	12.04869	11.52357	12.15446	11.62361	9.089382	8.692133	12.29719	11.76233	12.29719	11.76233
385700	3737600	8.284546	8.090516	11.22511	10.96063	11.22511	10.96063	10.99207	10.73179	10.99207	10.73179	11.08128	10.8193	8.284546	8.090516	11.22511	10.96063	11.22511	10.96063
386200	3737600	7.989288	7.714791	10.83173	10.4595	10.83173	10.4595	10.60182	10.23713	10.60182	10.23713	10.68458	10.31702	7.989288	7.714791	10.83173	10.4595	10.83173	10.4595
386700	3737600	7.671044	7.372461	10.40674	10.00301	10.40674	10.00301	10.18153	9.787457	10.18153	9.787457	10.2579	9.86051	7.671044	7.372461	10.40674	10.00301	10.40674	10.00301
387200	3737600	7.44054	7.18984	10.09947	9.759904	10.09947	9.759904	9.877754	9.547099	9.877754	9.547099	9.949315	9.616211	7.44054	7.18984	10.09947	9.759904	10.09947	9.759904
387700	3737600	7.255779	7.0146	9.854706	9.526475	9.854706	9.526475	9.63576	9.316946	9.63576	9.316946	9.702901	9.382428	7.255779	7.0146	9.854706	9.526475	9.854706	9.526475
388200	3737600	7.151048	6.98603	9.7179	9.492099	9.7179	9.492099	9.499652	9.279028	9.499652	9.279028	9.563428	9.341919	7.151048	6.98603	9.7179	9.492099	9.7179	9.492099
388700	3737600	6.923545	6.736088	9.412766	9.157334	9.412766	9.157334	9.199876	8.951254	9.199876	8.951254	9.259888	9.010025	6.923545	6.736088	9.412766	9.157334	9.412766	9.157334
389200	3737600	6.868998	6.60965	9.342659	8.990925	9.342659	8.990925	9.130142	8.788475	9.130142	8.788475	9.187988	8.84409	6.868998	6.60965	9.342659	8.990925	9.342659	8.990925
389700	3737600	6.717161	6.488078	9.1402	8.827056	9.1402	8.827056	8.931994	8.627249	8.931994	8.627249	8.987034	8.681134	6.717161	6.488078	9.1402	8.827056	9.1402	8.827056
380200	3738100	15.42725	14.93093	20.74849	20.07955	20.74849	20.07955	20.39157	19.65259	20.39157	19.65259	20.62671	19.96121	15.42725	14.93093	20.74849	20.07955	20.74849	20.07955
380700	3738100	16.13558	15.52091	21.69533	20.8676	21.69533	20.8676	21.3182	20.50409	21.3182	20.50409	21.56572	20.74247	16.13558	15.52091	21.69533	20.8676	21.69533	20.8676
381200	3738100	16.35964	15.58542	21.98539	20.94781	21.98539	20.94781	21.60164	20.58107	21.60164	20.58107	21.85647	20.82252	16.35964	15.58542	21.98539	20.94781	21.98539	20.94781
381700	3738100	16.30558	15.71486	21.91342	21.12012	21.91342	21.12012	21.52732	20.74656	21.52732	20.74656	21.78039	20.99007	16.30558	15.71486	21.91342	21.12012	21.91342	21.12012
382200	3738100	15.6119	14.57772	20.98788	19.60384	20.98788	19.60384	20.61373	19.25448	20.61373	19.25448	20.85297	19.47544	15.6119	14.57772	20.98788	19.60384	20.98788	19.60384
382700	3738100	14.0875	13.56748	18.95464	18.2569	18.95464	18.2569	18.61283	17.92657	18.61283	17.92657	18.822	18.12721	14.0875	13.56748	18.95464	18.2569	18.95464	18.2569
383200	3738100	12.78099	12.20754	17.21335	16.44515	17.21335	16.44515	16.89671	16.14224	16.89671	16.14224	17.07938	16.31509	12.78099	12.20754	17.21335	16.44515	17.21335	16.44515
383700	3738100	11.48698	11.07255	15.48944	14.93278	15.48944	14.93278	15.19873	14.65242	15.19873	14.65242	15.355	14.80224	11.48698	11.07255	15.48944	14.93278	15.48944	14.93278
384200	3738100	10.68083	10.11439	14.41546	13.6563	14.41546	13.6563	14.1397	13.39468	14.1397	13.39468	14.2794	13.52491	10.68083	10.11439	14.41546	13.6563	14.41546	13.6563
384700	3738100	9.701103	9.112712	13.10888	12.32055	13.10888	12.32055	12.85332	12.07902	12.85332	12.07902	12.97361	12.1893	9.701103	9.112712	13.10888	12.32055	13.10888	12.32055
385200	3738100	9.083663	8.616653	12.28494	11.65772	12.28494	11.65772	12.04002	11.42412	12.04002	11.42412	12.14794	11.52469	9.083663	8.616653	12.28494	11.65772	12.28494	11.65772
385700	3738100	8.606295	8.245249	11.65346	11.16757	11.65346	11.16757	11.41558	10.9379	11.41558	10.9379	11.51171	11.02862	8.606295	8.245249	11.65346	11.16757	11.65346	11.16757
386200	3738100	7.823206	7.573322	10.60648	10.26727	10.60648	10.26727	10.38446	10.05174	10.38446	10.05174	10.46603	10.13076	7.823206	7.573322	10.60648	10.26727	10.60648	10.26727
386700	3738100	7.58635	7.353084	10.29221	9.97575	10.29221	9.97575	10.07224	9.763248	10.07224	9.763248	10.14807	9.83686	7.58635	7.353084	10.29221	9.97575	10.29221	9.97575
387200	3738100	7.450921	7.133041	10.1123	9.68382	10.1123	9.68382	9.892037	9.474742	9.892037	9.474742	9.964452	9.543264	7.450921	7.133041	10.1123	9.68382	10.1123	9.68382
387700	3738100	7.112439	6.895194	9.66046	9.366096	9.66046	9.366096	9.448242	9.162114	9.448242	9.162114	9.51429	9.226161	7.112439	6.895194	9.66046	9.366096	9.66046	9.366096
388200	3738100	6.969333	6.743603	9.469207	9.16276	9.469207	9.16276	9.258515	8.960162	9.258515	8.960162	9.321651	9.021353	6.969333	6.743603	9.469207	9.16276	9.469207	9.16276
388700	3738100	6.858865	6.677353	9.321421	9.06608	9.321421	9.06608	9.112473	8.864324	9.112473	8.864324	9.172412	8.923055	6.858865	6.677353	9.321421	9.06608	9.321421	9.06608
389200	3738100	6.780744	6.544898	9.221932	8.901612	9.221932	8.901612	9.013172	8.702833	9.013172	8.702833	9.070691	8.758643	6.780744	6.544898	9.221932	8.901612	9.221932	8.901612
389700	3738100	6.647474	6.36994	9.044357	8.667919	9.044357	8.667919	8.838774	8.47397	8.838774	8.47397	8.89367	8.526633	6.647474	6.36994	9.044357	8.667919	9.044357	8.667919
380200	3738600	14.2651	13.82416	19.19197	18.59836	19.19197	18.59836	18.86183	18.27813	18.86183	18.27813	19.07689	18.48656	14.2651	13.82416	19.19197	18.59836	19.19197	18.59836
380700	3738600	14.62061	14.08854	19.66356	18.94979	19.66356	18.94979	19.32249	18.62076	19.32249	18.62076	19.54492	18.8344	14.62061	14.08854	19.66356	18.94979	19.66356	18.94979
381200	3738600	14.87115	14.29928	19.99709	19.2297	19.99709	19.2297	19.64775	18.89368	19.64775	18.89368	19.87487	19.1114	14.87115	14.29928	19.99709	19.2297	19.99709	19.2297
381700	3738600	14.9148	14.41129	20.05705	19.38035	20.05705	19.38035	19.70322	19.03769	19.70322	19.03769	19.92992	19.25644	14.9148	14.41129	20.05705	19.38035	20.05705	19.38035
382200	3738600	14.48097	13.5487	19.47903	18.23046	19.47903	18.23046	19.13166	17.90527	19.13166	17.90527	19.34919	18.10675	14.48097	13.5487	19.47903	18.23046	19.47903	18.23046
382700	3738600	13.38784	12.76295	18.01404	17.18274	18.01404	17.18274	17.68923	16.87189	17.68923	16.87189	17.88515	17.05744	13.38893	12.76295	18.01535	17.18291	18.01404	17.18291
383200	3738600	12.2505	11.64347	16.50503	15.69139	16.50503	15.69139	16.20143	15.40385	16.20143	15.40385	16.37423	15.56671	12.2505	11.64347	16.50503	15.69139	16.50503	15.69139
383700	3738600	11.00861	10.41576	14.84918	14.05534	14.84918	14.05534	14.57162	13.79209	14.57162	13.79209	14.71987	13.93011	11.00861	10.41576	14.84918	14.05534	14.84918	14.05534
384200	3738600	10.3732	9.879	14.00238	13.34005	14.00238	13.34005	13.73637	13.08594	13.73637	13.08594	13.87154	13.21279	10.3732	9.879	14.00238	13.34005	14.00238	13.34005
384700	3738600	9.674739	8.99048	13.07118	12.15585	13.07118	12.15585	12.81869	11.9197	12.81869	11.9197	12.93978	12.02864	9.674739	8.99048	13.07118	12.15585	13.07118	12.15585
385200	3738600	8.891232	8.57961	12.02672	11.60733	12.02672	11.60733	11.78835	11.37735	11.78835	11.37735	11.89346	11.47801	8.891232	8.57961	12.02672	11.60733	12.02672	11.60733
385700	3738600	8.476257	8.043102	11.47387	10.89219	11.47387	10.89219	11.24316	10.67118	11.24316	10.67118	11.3397	10.76076	8.476257	8.043102	11.47387	10.89219	11.47387	10.89219
386200	3738600	7.957845	7.634683	10.78327	10.34732	10.78327	10.34732	10.56148	10.13338	10.56148	10.13338	10.6472	10.21472	7.957845	7.634683	10.78327	10.34732	10.78327	10.34732
386700	3738600	7.499096	7.264675	10.17255	9.854246	10.17255	9.854246	9.958348	9.645999	9.958348	9.645999	10.03428	9.719576	7.499096	7.264675	10.17255	9.854246	10.17255	9.854246

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
387200	3738600	7.156184	6.891436	9.713414	9.35543	9.713414	9.35543	9.505355	9.155487	9.505355	9.155487	9.575041	9.222161	7.156184	6.891436	9.713414	9.35543	9.713414	9.35543
387700	3738600	6.963385	6.743819	9.456109	9.158684	9.456109	9.158684	9.251152	8.960903	9.251152	8.960903	9.316951	9.024464	6.963385	6.743819	9.456109	9.158684	9.456109	9.158684
388200	3738600	6.873531	6.5765	9.338353	8.936319	9.338353	8.936319	9.132286	8.741236	9.132286	8.741236	9.195069	8.801102	6.873531	6.5765	9.338353	8.936319	9.338353	8.936319
388700	3738600	6.60124	6.434308	8.974302	8.745863	8.974302	8.745863	8.775508	8.552841	8.775508	8.552841	8.833512	8.610043	6.60124	6.434308	8.974302	8.745863	8.974302	8.745863
389200	3738600	6.647209	6.420413	9.021727	8.726338	9.021727	8.726338	8.819593	8.53246	8.819593	8.53246	8.876452	8.587951	6.647209	6.420413	9.021727	8.726338	9.021727	8.726338
389700	3738600	6.515485	6.286705	8.864523	8.552723	8.864523	8.552723	8.665095	8.362824	8.665095	8.362824	8.719336	8.415759	6.515485	6.286705	8.864523	8.552723	8.864523	8.552723
380200	3739100	13.18482	12.83812	17.74497	17.27878	17.74497	17.27878	17.44014	16.98151	17.44014	16.98151	17.63651	17.17261	13.18482	12.83812	17.74497	17.27878	17.74497	17.27878
380700	3739100	13.92304	13.44462	18.73462	18.09087	18.73462	18.09087	18.40906	17.77658	18.40906	17.77658	18.61743	17.97782	13.92304	13.44462	18.73462	18.09087	18.73462	18.09087
381200	3739100	14.07201	13.30176	18.93139	17.8996	18.93139	17.8996	18.59962	17.58556	18.59962	17.58556	18.81096	17.78379	14.07201	13.30176	18.93139	17.8996	18.93139	17.8996
381700	3739100	13.66849	13.09967	18.39146	17.62844	18.39146	17.62844	18.06791	17.31722	18.06791	17.31722	18.2719	17.51173	13.66849	13.09967	18.39146	17.62844	18.39146	17.62844
382200	3739100	13.388	12.55839	18.0196	16.90853	18.0196	16.90853	17.69882	16.60577	17.69882	16.60577	17.89614	16.78845	13.388	12.55839	18.0196	16.90853	18.0196	16.90853
382700	3739100	12.64128	12.12552	17.02529	16.33171	17.02529	16.33171	16.71853	16.03662	16.71853	16.03662	16.90022	16.21043	12.64128	12.12552	17.02529	16.33171	17.02529	16.33171
383200	3739100	11.84072	11.20322	15.95702	15.10284	15.95702	15.10284	15.66406	14.82649	15.66406	14.82649	15.82965	14.98156	11.84072	11.20322	15.95702	15.10284	15.95702	15.10284
383700	3739100	10.63675	10.27027	14.35213	13.85963	14.35213	13.85963	14.08458	13.60167	14.08458	13.60167	14.2262	13.73776	10.63675	10.27027	14.35213	13.85963	14.35213	13.85963
384200	3739100	9.970418	9.626585	13.46396	13.00161	13.46396	13.00161	13.20902	12.75519	13.20902	12.75519	13.33713	12.87811	9.970418	9.626585	13.46396	13.00161	13.46396	13.00161
384700	3739100	9.385244	9.042626	12.68357	12.22268	12.68357	12.22268	12.43957	11.98744	12.43957	11.98744	12.55591	12.09871	9.385244	9.042626	12.68357	12.22268	12.68357	12.22268
385200	3739100	8.886379	8.229043	12.0193	11.13876	12.0193	11.13876	11.78297	10.91852	11.78297	10.91852	11.88865	11.01302	8.886379	8.229043	12.0193	11.13876	12.0193	11.13876
385700	3739100	8.184633	7.881518	11.08111	10.6724	11.08111	10.6724	10.85978	10.45792	10.85978	10.45792	10.9525	10.54638	8.184633	7.881518	11.08111	10.6724	11.08111	10.6724
386200	3739100	7.948827	7.538972	10.768	10.21676	10.768	10.21676	10.54922	10.0075	10.54922	10.0075	10.63641	10.08845	7.948827	7.538972	10.768	10.21676	10.768	10.21676
386700	3739100	7.538567	7.201578	10.22136	9.765902	10.22136	9.765902	10.00906	9.562438	10.00906	9.562438	10.08764	9.636858	7.538567	7.201578	10.22136	9.765902	10.22136	9.765902
387200	3739100	7.098143	6.840647	9.633131	9.283994	9.633131	9.283994	9.429128	9.088136	9.429128	9.088136	9.499185	9.155648	7.098143	6.840647	9.633131	9.283994	9.633131	9.283994
387700	3739100	6.80482	6.581734	9.241463	8.939089	9.241463	8.939089	9.042733	8.748527	9.042733	8.748527	9.107034	8.810765	6.80482	6.581734	9.241463	8.939089	9.241463	8.939089
388200	3739100	6.667422	6.370104	9.058046	8.656457	9.058046	8.656457	8.861131	8.470733	8.861131	8.470733	8.922612	8.529017	6.667422	6.370104	9.058046	8.656457	9.058046	8.656457
388700	3739100	6.556816	6.339778	8.9118	8.617108	8.9118	8.617108	8.716274	8.428114	8.716274	8.428114	8.774968	8.484758	6.556816	6.339778	8.9118	8.617108	8.9118	8.617108
389200	3739100	6.360499	6.175729	8.649881	8.398181	8.649881	8.398181	8.459136	8.212516	8.459136	8.212516	8.514097	8.265958	6.360499	6.175729	8.649881	8.398181	8.649881	8.398181
389700	3739100	6.357723	6.129273	8.639569	8.334251	8.639569	8.334251	8.446815	8.150569	8.446815	8.150569	8.500137	8.202287	6.357723	6.129273	8.639569	8.334251	8.639569	8.334251
380200	3739600	12.71235	12.36457	17.11567	16.64641	17.11567	16.64641	16.8212	16.35992	16.8212	16.35992	17.00806	16.54156	12.71235	12.36457	17.11567	16.64641	17.11567	16.64641
380700	3739600	12.6354	12.33589	17.01078	16.60665	17.01078	16.60665	16.7167	16.3193	16.7167	16.3193	16.90271	16.50121	12.6354	12.33589	17.01078	16.60665	17.01078	16.60665
381200	3739600	12.71412	12.12592	17.11538	16.32608	17.11538	16.32608	16.81672	16.04028	16.81672	16.04028	17.00399	16.2178	12.71412	12.12592	17.11538	16.32608	17.11538	16.32608
381700	3739600	12.8299	12.23367	17.27264	16.47223	17.27264	16.47223	16.96753	16.18222	16.96753	16.18222	17.15548	16.36057	12.8299	12.23367	17.27264	16.47223	17.27264	16.47223
382200	3739600	12.36221	11.75482	16.64897	15.83382	16.64897	15.83382	16.3526	15.5512	16.3526	15.5512	16.53107	15.71972	12.36221	11.75482	16.64897	15.83382	16.64897	15.83382
382700	3739600	11.89244	11.31603	16.02409	15.24979	16.02409	15.24979	15.73522	14.97465	15.73522	14.97465	15.90341	15.13382	11.89244	11.31603	16.02409	15.24979	16.02409	15.24979
383200	3739600	11.20838	10.50259	15.11229	14.16629	15.11229	14.16629	14.83517	13.90796	14.83517	13.90796	14.9892	14.05049	11.20838	10.50259	15.11229	14.16629	15.11229	14.16629
383700	3739600	10.35011	10.0578	13.96805	13.57362	13.96805	13.57362	13.70847	13.32151	13.70847	13.32151	13.84545	13.4546	10.35011	10.0578	13.96805	13.57362	13.96805	13.57362
384200	3739600	9.627933	9.108721	13.00561	12.30913	13.00561	12.30913	12.75988	12.07587	12.75988	12.07587	12.88213	12.18961	9.627933	9.108721	13.00561	12.30913	13.00561	12.30913
384700	3739600	9.195637	8.776326	12.42871	11.86577	12.42871	11.86577	12.1909	11.63834	12.1909	11.63834	12.30458	11.74537	9.195637	8.776326	12.42871	11.86577	12.42871	11.86577
385200	3739600	8.786724	8.253277	11.88408	11.1692	11.88408	11.1692	11.6522	10.95057	11.6522	10.95057	11.75714	11.04658	8.786724	8.253277	11.88408	11.1692	11.88408	11.1692
385700	3739600	8.032077	7.630405	10.87441	10.33504	10.87441	10.33504	10.65898	10.12879	10.65898	10.12879	10.75031	10.21368	8.032077	7.630405	10.87441	10.33504	10.87441	10.33504
386200	3739600	7.736838	7.520133	10.48185	10.18832	10.48185	10.18832	10.27015	9.982006	10.27015	9.982006	10.35484	10.06422	7.736838	7.520133	10.48185	10.18832	10.48185	10.18832
386700	3739600	7.490651	7.112296	10.15338	9.643999	10.15338	9.643999	9.945214	9.445107	9.945214	9.445107	10.02484	9.519235	7.490651	7.112296	10.15338	9.643999	10.15338	9.643999
387200	3739600	7.146731	6.781129	9.695215	9.201757	9.695215	9.201757	9.492238	9.009894	9.492238	9.009894	9.564578	9.077722	7.146731	6.781129	9.695215	9.201757	9.695215	9.201757
387700	3739600	6.812625	6.555793	9.249173	8.901957	9.249173	8.901957	9.05209	8.713858	9.05209	8.713858	9.117823	8.776827	6.812625	6.555793	9.249173	8.901957	9.249173	8.901957
388200	3739600	6.499871	6.30315	8.831034	8.564644	8.831034	8.564644	8.64083	8.382177	8.64083	8.382177	8.700841	8.440352	6.499871	6.30315	8.831034	8.564644	8.831034	8.564644
388700	3739600	6.415148	6.145938	8.718242	8.354842	8.718242	8.354842	8.528077	8.174793	8.528077	8.174793	8.586056	8.229787	6.415148	6.145938	8.718242	8.354842	8.718242	8.354842
389200	3739600	6.270054	6.063703	8.525578	8.245634	8.525578	8.245634	8.338887	8.0661	8.338887	8.0661	8.393774	8.119096	6.270054	6.063703	8.525578	8.245634	8.525578	8.245634
389700	3739600	6.122534	5.889335	8.328186	8.012217	8.328186	8.012217	8.144634	7.83785	8.144634	7.83785	8.196845	7.887967	6.122534	5.889335	8.328186	8.012217	8.328186	8.012217
380200	3740100	12.20323	11.76132	16.43748	15.84012	16.43748	15.84012	16.15357	15.56679	16.15357	15.56679	16.33016	15.73634	12.22266	11.76132	16.43748	15.84012	16.43748	15.84012
380700	3740100	11.94347	11.57203	16.08694	15.5869	16.08694	15.5869	15.80789	15.31723	15.80789	15.31723	15.9808	15.4847	11.94347	11.57203	16.08694	15.5869	16.08694	15.5869
381200	3740100	11.96378	11.40401	16.11361	15.36252	16.11361	15.36252	15.83217	15.0937	15.83217	15.0937	16.00533	15.25756	11.96378	11.40401	16.11361	15.36252	16.11361	15.36252
381700	3740100	11.99221	11.4786	16.15392	15.46339	16.15392	15.46339	15.86841	15.19078	15.86841	15.19078	16.04064	15.35529	11.99221	11.4786	16.15392	15.46339	16.15392	15.46339
382200	3740100	11.56951	11.07348	15.59026	14.92365	15.59026	14.92365	15.3132	14.65755	15.3132	14.65755	15.47699	14.8135	11.56951	11.07348	15.59026	14.92365	15.59026	14.92365
382700	3740100	11.13862	10.68579	15.0161	14.40674	15.0161	14.40674	14.74562	14.1468	14.74562	14.1468	14.90038	14.29474	11.13862	10.68579	15.0161	14.40674	15.0161	14.40674
383200	3740100	10.57789	10.15217	14.26905	13.69529	14.26905	13.69529	13.99839	13.44552	13.99839	13.44552	14.15209	13.58395	10.57789	10.15217	14.26905	13.69529	14.26905	13.69529
383700	3740100	9.925292	9.570133	13.39794	12.92069	13.39794	12.92069	13.15038	12.68139	13.15038	12.68139	13.28077	12.80622	9.925292	9.570133	13.39794	12.92069	13.39794	12.92069
384200	3740100	9.215605	8.769601	12.45234	11.85402	12.45234	11.85402	12.21766	11.63039	12.21766	11.63039	12.3334	11.7389	9.215605	8.769601	12.45234	11.85402	12.45234	11.85402
384700	3740100	8.880088	8.586179	12.00646	11.61066	12.00646	11.61066	11.77732	11.38927	11.77732	11.38927	11.88563	11.49344	8.880088	8.586179	12.00646	11.61066	12.00646	11.61066
385200	3740100	8.554454	8.18942	11.57215	11.08169	11.57215	11.08169	11.34757	10.86639	11.34757	10.86639	11.44912	10.96231	8.554454	8.18942	11.57215	11.08169	11.57215	11.08169
385700	3740100	7.978606	7.513919	10.79973	10.17739	10.79973	10.17739	10.588	9.97635	10.588	9.97635	10.67992	10.06022	7.978606	7.513919	10.79973	10.17739	10.79973	10.17739
386200	3740100	7.565279	7.251288	10.25001	9.828116	10.25001	9.828116	10.04431	9.62964	10.04431	9.62964	10.1271	9.707493	7.565279	7.251288	10.25001	9.828116	10.25001	9.828116
386700	3740100	7.386015	7.110776	10.01183	9.640926	10.01183	9.640926	9.807454	9.443979	9.807454	9.443979	9.886022	9.518772	7.386015	7.110776	10.01183	9.640926	10.01183	9.640926
387200	3740100	7.119784	6.736923	9.65589	9.140623	9.65589	9.140623	9.456333	8.951516	9.456333	8.951516	9.529843	9.019574	7.119784	6.736923	9.65589	9.140623	9.65589	9.140623
387700	3740100	6.803913	6.47107	9.23453	8.786362	9.23453	8.786362	9.040368	8.602736	9.040368	8.602736	9.10747	8.665421	6.803913	6.47107	9.23453	8.786362	9.23453	8.786362
388200	3740100	6.508281	6.295432	8.839605	8.552704	8.839605	8.552704	8.651263	8.371679	8.651263	8.371679	8.712725	8.430517	6.508281	6.295432	8.839605	8.552704	8.839605	8.552704
388700	3740100	6.278423	6.071679	8.532616	8.253443	8.532616	8.253443	8.347951	8.077348	8.347951	8.077348	8.40487	8.132123	6.278423	6.071679	8.532616	8.253443	8.532616	8.253443
389200	3740100	6.131933	5.932391	8.337159	8.067612	8.337159	8.067612	8.156172	7.893235	8.156172	7.893235	8.210324	7.945086	6.131933	5.932391	8.337159	8.067612	8.337159	8.067612
389700	3740100	5.983779	5.790983	8.139447	7.878697	8.139447	7.878697	7.962276	7.707498	7.962276	7.707498	8.013667	7.756724	5.983779	5.790983	8.139447	7.878697	8.139447	7.878697
380200	3740600	11.53015	11.01892	15.53809	14.73719	15.53809	14.73719	15.27014	14.48282	15.27014	14.48282	15.43438	14.63696	11.53015	11.01892	15.53809	14.73719	15.53809	14.73719
380700	3740600	11.08539	10.71474	14.93914	14.44107	14.93914	14.44107	14.68052	14.19069	14.68052	14.19069	14.83813	14.3424	11.08539	10.71474	14.93914	14.44107	14.93914	14.44107
381200	3740600	11.43837	10.73916	15.41286	14.47668	15.41286	14.47668	15.1437	14.22271	15.1437	14.22271	15.30669	14.37334	11.43837	10.73916	15.41286	14.47668	15.41286	14.47668
381700	3740600	11.05936	10.70567	14.90596	14.4297	14.90596	14.4297	14.64392	14.17542	14.64392	14.17542	14.7997	14.32604	11.05936	10.70567	14.90596	14.4297	14.90596	14.4297
382200	3740600	10.87144	10.48151	14.65743	14.13251	14.65743	14.13251	14.39703	13.88109	14.39703	13.88109	14.54807	14.02638	10.87144	10.48151	14.65743	14.13251	14.65743	14.13251
382700	3740600	10.56051	10.17513	14.24318	13.72426	14.24318	13.72426	13.98732	13.47673	13.98732	13.47673	14.1317	13.61545	10.56051	10.17513	14.24318	13.72426	14.24318	13.72426
383200	3740600	10.04842	9.669564	13.56087	13.05005	13.56087	13.05005	13.31419	12.81319	13.31419	12.81319	13.44802	12.94188	10.04842	9.669564	13.56087	13.05005	13.56087	13.05005
383700	3740600	9.556822	9.175414	12.90429	12.3921	12.90429	12.3921	12.66644	12.16286	12.66644	12.16286	12.79071	12.28099	9.556822	9.175414	12.90429	12.3921	12.90429	12.3921
384200	3740600	8.991578	8.618644	12.15079	11.65026	12.15079	11.65026	11.92261	11.43201	11.92261	11.43201	12.03523	11.53879	8.991578	8.618644	12.15079	11.65026	12.15079	11.65026
384700	3740600	8.495718	8.0589	11.48768	10.90266	11.48768	10.90266	11.2698	10.69576	11.2698	10.69576	11.3733	10.79185	8.495718	8.0589	11.48768	10.90266	11.48768	10.90266
385200	3740600	8.261332	7.916818	11.17694	10.71482	11.17694	10.71482	10.96128	10.50787	10.96128	10.50787	11.05905	10.60006	8.261332	7.916818	11.17694	10.71482	11.17694	10.71482
385700	3740600	7.848156	7.55984	10.62502	10.23802	10.62502	10.23802	10.41693	10.03737	10.41693	10.03737	10.5067	10.12259	7.848156	7.55984	10.62502	10.23802	10.62502	10.23802
386200	3740600	7.671542	7.106426	10.39281	9.636794	10.39281	9.636794	10.18519	9.44241	10.18519	9.44241	10.26974	9.516896	7.671542	7.106426	10.39281	9.636794	10.39281	9.636794
386700	3740600	7.187466	6.887182	9.743962	9.340478	9.743962	9.340478	9.546138	9.150908	9.546138	9.150908	9.622298	9.222558	7.187466	6.887182	9.743962	9.340478	9.743962	9.340478
387200	3740600	6.972979	6.662152	9.457021	9.038976	9.457021	9.038976	9.263733	8.853754	9.263733	8.853754	9.335964	8.921423	6.972979	6.662152	9.457021	9.038976	9.457021	9.038976
387700	3740600	6.776888	6.418205	9.195609	8.713043	9.195609	8.713043	9.004967	8.532135	9.004967	8.532135	9.073064	8.595075	6.776888	6.418205	9.195609	8.713043	9.195609	8.713043
388200	3740600	6.462305	6.155894	8.775163	8.363169	8.775163	8.363169	8.591071	8.189007	8.591071	8.189007	8.653305	8.246976	6.462305	6.155894	8.775163	8.363169	8.775163	8.363169
388700	3740600	6.224185	5.97428	8.456914	8.12065	8.456914	8.12065	8.276168	7.950299	8.276168	7.950299	8.333685	8.004806	6.224185	5.97428	8.456914	8.12065	8.456914	8.12065
389200	3740600	6.026469	5.843815	8.193197	7.947059	8.193197	7.947059	8.016472	7.777114	8.016472	7.777114	8.070082	7.828533	6.026469	5.843815	8.193197	7.947059	8.193197	7.947059
389700	3740600	5.889362	5.710466	8.01104	7.769141	8.01104	7.769141	7.83749	7.601771	7.83749	7.601771	7.888203	7.650547	5.889362	5.710466	8.01104	7.769141	8.01104	7.769141
380200	3741100	10.93198	10.3739	14.73781	13.98959	14.73781	13.98959	14.48413	13.74853	14.48413	13.74853	14.63774	13.89272	10.93198	10.3739	14.73781	13.98959	14.73781	13.98959

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
380700	3741100	10.8258	10.43959	14.59549	14.07632	14.59549	14.07632	14.34214	13.83112	14.34214	13.83112	14.49361	13.97648	10.8258	10.43959	14.59549	14.07632	14.59549	14.07632
381200	3741100	10.78157	10.17463	14.53481	13.72155	14.53481	13.72155	14.28073	13.48183	14.28073	13.48183	14.4317	13.62254	10.78157	10.17463	14.53481	13.72155	14.53481	13.72155
381700	3741100	10.52432	10.1786	14.19228	13.72679	14.19228	13.72679	13.94228	13.48461	13.94228	13.48461	14.08782	13.62499	10.52432	10.1786	14.19228	13.72679	14.19228	13.72679
382200	3741100	10.24084	9.934622	13.81367	13.40089	13.81367	13.40089	13.56828	13.16232	13.56828	13.16232	13.70819	13.29785	10.24084	9.934622	13.81367	13.40089	13.81367	13.40089
382700	3741100	9.971699	9.637239	13.45536	13.00445	13.45536	13.00445	13.21342	12.77097	13.21342	12.77097	13.34741	12.90038	9.971699	9.637239	13.45536	13.00445	13.45536	13.00445
383200	3741100	9.559495	9.276759	12.90606	12.52404	12.90606	12.52404	12.67133	12.29675	12.67133	12.29675	12.79681	12.41869	9.559495	9.276759	12.90606	12.52404	12.90606	12.52404
383700	3741100	9.2405	8.796595	12.4797	11.88303	12.4797	11.88303	12.25038	11.66381	12.25038	11.66381	12.3697	11.77568	9.241401	8.796595	12.4797	11.88303	12.4797	11.88303
384200	3741100	8.668	8.476721	11.71632	11.45799	11.71632	11.45799	11.49687	11.24462	11.49687	11.24462	11.60452	11.35	8.668	8.476721	11.71632	11.45799	11.71632	11.45799
384700	3741100	8.210202	7.833885	11.10626	10.60181	11.10626	10.60181	10.89578	10.40097	10.89578	10.40097	10.99411	10.49311	8.210202	7.833885	11.10626	10.60181	11.10626	10.60181
385200	3741100	7.901754	7.677193	10.69304	10.39142	10.69304	10.39142	10.48757	10.19195	10.48757	10.19195	10.58026	10.28121	7.901754	7.677193	10.69304	10.39142	10.69304	10.39142
385700	3741100	7.643938	7.404711	10.34891	10.02771	10.34891	10.02771	10.14732	9.832742	10.14732	9.832742	10.2348	9.916552	7.643938	7.404711	10.34891	10.02771	10.34891	10.02771
386200	3741100	7.458686	7.104537	10.10344	9.629129	10.10344	9.629129	9.903437	9.437593	9.903437	9.437593	9.986312	9.514386	7.458686	7.104537	10.10344	9.629129	10.10344	9.629129
386700	3741100	7.055169	6.704855	9.564421	9.094966	9.564421	9.094966	9.371905	8.911564	9.371905	8.911564	9.446986	8.980854	7.055169	6.704855	9.564421	9.094966	9.564421	9.094966
387200	3741100	6.802243	6.529574	9.226567	8.860132	9.226567	8.860132	9.038965	8.679912	9.038965	8.679912	9.109203	8.746056	6.802243	6.529574	9.226567	8.860132	9.226567	8.860132
387700	3741100	6.674569	6.334688	9.05653	8.599018	9.05653	8.599018	8.870037	8.422776	8.870037	8.422776	8.937412	8.485493	6.674569	6.334688	9.05653	8.599018	9.05653	8.599018
388200	3741100	6.511805	6.141599	8.839886	8.342316	8.839886	8.342316	8.655341	8.168649	8.655341	8.168649	8.719115	8.227024	6.511805	6.141599	8.839886	8.342316	8.839886	8.342316
388700	3741100	6.224353	5.926506	8.455086	8.055198	8.455086	8.055198	8.276619	7.88668	8.276619	7.88668	8.33525	7.941013	6.224353	5.926506	8.455086	8.055198	8.455086	8.055198
389200	3741100	5.991342	5.769313	8.143605	7.844698	8.143605	7.844698	7.968909	7.679433	7.968909	7.679433	8.023033	7.730983	5.991342	5.769313	8.143605	7.844698	8.143605	7.844698
389700	3741100	5.805669	5.617062	7.895967	7.641588	7.895967	7.641588	7.726133	7.47889	7.726133	7.47889	7.776762	7.527356	5.805669	5.617062	7.895967	7.641588	7.895967	7.641588
380200	3741600	10.23454	9.964937	13.80529	13.44156	13.80529	13.44156	13.56693	13.21024	13.56693	13.21024	13.70775	13.34754	10.23454	9.964937	13.80529	13.44156	13.80529	13.44156
380700	3741600	10.30933	9.846835	13.90447	13.28402	13.90447	13.28402	13.66306	13.05315	13.66306	13.05315	13.80538	13.18778	10.30933	9.846835	13.90447	13.28402	13.90447	13.28402
381200	3741600	9.987748	9.48366	13.47181	12.79638	13.47181	12.79638	13.23652	12.5736	13.23652	12.5736	13.37384	12.70237	9.987748	9.48366	13.47181	12.79638	13.47181	12.79638
381700	3741600	9.864995	9.57358	13.31035	12.91769	13.31035	12.91769	13.07601	12.69043	13.07601	12.69043	13.20975	12.82005	9.864995	9.57358	13.31035	12.91769	13.31035	12.91769
382200	3741600	9.739018	9.445311	13.14212	12.74636	13.14212	12.74636	12.90882	12.51973	12.90882	12.51973	13.0399	12.64659	9.739018	9.445311	13.14212	12.74636	13.14212	12.74636
382700	3741600	9.408183	9.110218	12.70122	12.29916	12.70122	12.29916	12.47265	12.07944	12.47265	12.07944	12.59675	12.19976	9.408183	9.110218	12.70122	12.29916	12.70122	12.29916
383200	3741600	9.05925	8.867912	12.23564	11.97614	12.23564	11.97614	12.01335	11.75881	12.01335	11.75881	12.13047	11.8739	9.05925	8.867912	12.23564	11.97614	12.23564	11.97614
383700	3741600	8.794608	8.353275	11.88265	11.29047	11.88265	11.29047	11.66478	11.08321	11.66478	11.08321	11.77653	11.18778	8.794608	8.353275	11.88265	11.29047	11.88265	11.29047
384200	3741600	8.4228	8.143986	11.38604	11.01142	11.38604	11.01142	11.17366	10.80721	11.17366	10.80721	11.27797	10.90741	8.4228	8.143986	11.38604	11.01142	11.38604	11.01142
384700	3741600	7.934523	7.574439	10.73502	10.25289	10.73502	10.25289	10.53239	10.05943	10.53239	10.05943	10.62693	10.14784	7.934523	7.574439	10.73502	10.25289	10.73502	10.25289
385200	3741600	7.725026	7.350809	10.45502	9.953935	10.45502	9.953935	10.25518	9.763379	10.25518	9.763379	10.34555	9.847345	7.725026	7.350809	10.45502	9.953935	10.45502	9.953935
385700	3741600	7.464605	7.200063	10.10693	9.751806	10.10693	9.751806	9.91104	9.563526	9.91104	9.563526	9.996318	9.644771	7.464605	7.200063	10.10693	9.751806	10.10693	9.751806
386200	3741600	7.125386	6.909007	9.653522	9.362832	9.653522	9.362832	9.463884	9.178636	9.463884	9.178636	9.54272	9.254119	7.125386	6.909007	9.653522	9.362832	9.653522	9.362832
386700	3741600	6.945774	6.561667	9.414685	8.900049	9.414685	8.900049	9.22744	8.721965	9.22744	8.721965	9.302242	8.790244	6.945774	6.561667	9.414685	8.900049	9.414685	8.900049
387200	3741600	6.611789	6.371295	8.969837	8.64621	8.969837	8.64621	8.788114	8.471503	8.788114	8.471503	8.855894	8.535907	6.611789	6.371295	8.969837	8.64621	8.969837	8.64621
387700	3741600	6.536011	6.206779	8.869334	8.426177	8.869334	8.426177	8.687462	8.254591	8.687462	8.254591	8.753265	8.315935	6.536011	6.206779	8.869334	8.426177	8.869334	8.426177
388200	3741600	6.396027	6.063885	8.682287	8.234572	8.682287	8.234572	8.502514	8.065198	8.502514	8.065198	8.565547	8.123983	6.396027	6.063885	8.682287	8.234572	8.682287	8.234572
388700	3741600	6.189328	5.834685	8.40536	7.929142	8.40536	7.929142	8.229912	7.764298	8.229912	7.764298	8.289341	7.818425	6.189328	5.834685	8.40536	7.929142	8.40536	7.929142
389200	3741600	5.972855	5.679538	8.116194	7.722369	8.116194	7.722369	7.94397	7.560253	7.94397	7.560253	7.999085	7.611185	5.972855	5.679538	8.116194	7.722369	8.116194	7.722369
389700	3741600	5.748747	5.597759	7.8172	7.613243	7.8172	7.613243	7.65011	7.451491	7.65011	7.451491	7.700907	7.500621	5.748747	5.597759	7.8172	7.613243	7.8172	7.613243
380200	3742100	9.747285	9.523311	13.15329	12.85081	13.15329	12.85081	12.9265	12.62908	12.9265	12.62908	13.05874	12.75837	9.747285	9.523311	13.15329	12.85081	13.15329	12.85081
380700	3742100	9.698036	9.252893	13.08549	12.4891	13.08549	12.4891	12.859	12.27267	12.859	12.27267	12.99094	12.39695	9.698036	9.252893	13.08549	12.4891	13.08549	12.4891
381200	3742100	9.538502	9.108867	12.87203	12.29604	12.87203	12.29604	12.64727	12.08169	12.64727	12.08169	12.77608	12.20333	9.538502	9.108867	12.87203	12.29604	12.87203	12.29604
381700	3742100	9.296969	9.055512	12.54965	12.224	12.54965	12.224	12.32913	12.00918	12.32913	12.00918	12.45311	12.12985	9.296969	9.055512	12.54965	12.224	12.54965	12.224
382200	3742100	9.269409	8.918075	12.51321	12.04072	12.51321	12.04072	12.29106	11.82726	12.29106	11.82726	12.41404	11.94497	9.269409	8.918075	12.51321	12.04072	12.51321	12.04072
382700	3742100	8.892492	8.623108	12.01085	11.647	12.01085	11.647	11.79488	11.43953	11.79488	11.43953	11.91004	11.55151	8.892492	8.623108	12.01085	11.647	12.01085	11.647
383200	3742100	8.685881	8.409323	11.73472	11.36176	11.73472	11.36176	11.52213	11.15568	11.52213	11.15568	11.63327	11.26301	8.685881	8.409323	11.73472	11.36176	11.73472	11.36176
383700	3742100	8.412436	8.13425	11.37014	10.99501	11.37014	10.99501	11.1619	10.79411	11.1619	10.79411	11.2674	10.89587	8.412436	8.13425	11.37014	10.99501	11.37014	10.99501
384200	3742100	8.076762	7.869921	10.92189	10.64272	10.92189	10.64272	10.71872	10.44605	10.71872	10.44605	10.8175	10.5423	8.076762	7.869921	10.92189	10.64272	10.92189	10.64272
384700	3742100	7.783699	7.386576	10.53044	9.998585	10.53044	9.998585	10.33287	9.811012	10.33287	9.811012	10.42601	9.897392	7.783699	7.386576	10.53044	9.998585	10.53044	9.998585
385200	3742100	7.406246	7.042422	10.02556	9.538294	10.02556	9.538294	9.834823	9.356491	9.834823	9.356491	9.920888	9.436332	7.406246	7.042422	10.02556	9.538294	10.02556	9.538294
385700	3742100	7.186638	6.932665	9.73298	9.391586	9.73298	9.391586	9.545091	9.211135	9.545091	9.211135	9.62642	9.288795	7.186638	6.932665	9.73298	9.391586	9.73298	9.391586
386200	3742100	6.927989	6.761427	9.387038	9.162557	9.387038	9.162557	9.203707	8.983298	9.203707	8.983298	9.280165	9.057422	6.927989	6.761427	9.387038	9.162557	9.387038	9.162557
386700	3742100	6.766507	6.566571	9.173221	8.904128	9.173221	8.904128	8.99187	8.727507	8.99187	8.727507	9.064349	8.797032	6.766507	6.566571	9.173221	8.904128	9.173221	8.904128
387200	3742100	6.577897	6.196702	8.921704	8.410761	8.921704	8.410761	8.742529	8.241096	8.742529	8.241096	8.811007	8.30324	6.577897	6.196702	8.921704	8.410761	8.921704	8.410761
387700	3742100	6.324269	6.11121	8.584226	8.296419	8.584226	8.296419	8.409078	8.128768	8.409078	8.128768	8.47207	8.18938	6.324269	6.11121	8.584226	8.296419	8.584226	8.296419
388200	3742100	6.254874	5.959436	8.49178	8.093324	8.49178	8.093324	8.317215	7.927738	8.317215	7.927738	8.378648	7.985425	6.254874	5.959436	8.49178	8.093324	8.49178	8.093324
388700	3742100	6.061065	5.785686	8.231451	7.860386	8.231451	7.860386	8.061795	7.699339	8.061795	7.699339	8.12023	7.75418	6.061065	5.785686	8.231451	7.860386	8.231451	7.860386
389200	3742100	5.937882	5.568814	8.066748	7.571662	8.066748	7.571662	7.897833	7.415194	7.897833	7.415194	7.953694	7.465584	5.937882	5.568814	8.066748	7.571662	8.066748	7.571662
389700	3742100	5.716118	5.421759	7.770349	7.375469	7.770349	7.375469	7.605989	7.221112	7.605989	7.221112	7.657696	7.268472	5.716118	5.421759	7.770349	7.375469	7.770349	7.375469
389978	3741459	5.725512	5.555197	7.788493	7.557908	7.788493	7.557908	7.620734	7.396315	7.620734	7.396315	7.670055	7.443956	5.725512	5.555197	7.788493	7.557908	7.788493	7.557908
380022	3739531	12.89943	12.62041	17.37018	16.99246	17.37018	16.99246	17.07092	16.69939	17.07092	16.69939	17.25955	16.88467	12.89943	12.62041	17.37018	16.99246	17.37018	16.99246
379814	3739341	13.04216	12.54509	17.56131	16.89254	17.56131	16.89254	17.26044	16.60275	17.26044	16.60275	17.45183	16.78663	13.04216	12.54509	17.56131	16.89254	17.56131	16.89254
379142	3733893	12.57946	12.24243	17.00472	16.54668	17.00472	16.54668	16.7249	16.27417	16.7249	16.27417	16.88686	16.43266	12.57946	12.24243	17.00472	16.54668	17.00472	16.54668
389449	3739338	6.217602	6.016993	8.456634	8.183805	8.456634	8.183805	8.270433	8.004447	8.270433	8.004447	8.323804	8.056211	6.217602	6.016993	8.456634	8.183805	8.456634	8.183805
389215	3739462	6.244367	6.052538	8.491166	8.230576	8.491166	8.230576	8.305503	8.050528	8.305503	8.050528	8.360001	8.103245	6.244367	6.052538	8.491166	8.230576	8.491166	8.230576
378929	3734007	12.10155	11.79276	16.36762	15.9469	16.36762	15.9469	16.09983	15.68601	16.09983	15.68601	16.25261	15.83597	12.10155	11.79276	16.36762	15.9469	16.36762	15.9469
389539	3741329	5.821777	5.663934	7.916034	7.702995	7.916034	7.702995	7.746445	7.539181	7.746445	7.539181	7.798001	7.588946	5.821777	5.663934	7.916034	7.702995	7.916034	7.702995
390167	3738394	6.355378	6.172027	8.650905	8.399157	8.650905	8.399157	8.456176	8.210897	8.456176	8.210897	8.507512	8.26168	6.355378	6.172027	8.650905	8.399157	8.650905	8.399157
390353	3741373	5.719769	5.550874	7.78479	7.555263	7.78479	7.555263	7.614907	7.392437	7.614907	7.392437	7.662309	7.438631	5.719769	5.550874	7.78479	7.555263	7.78479	7.555263
383100	3738224	12.88991	12.26113	17.35779	16.51581	17.35779	16.51581	17.04009	16.21284	17.04009	16.21284	17.22542	16.38723	12.88991	12.26113	17.35779	16.51581	17.35779	16.51581
387369	3742073	6.464062	6.195121	8.770292	8.408719	8.770292	8.408719	8.59324	8.239096	8.59324	8.239096	8.659275	8.301179	6.464062	6.195121	8.770292	8.408719	8.770292	8.408719
387922	3743131	6.095442	5.742699	8.274111	7.800878	8.274111	7.800878	8.106993	7.644175	8.106993	7.644175	8.167794	7.699536	6.095442	5.742699	8.274111	7.800878	8.274111	7.800878
387401	3740832	6.860499	6.518667	9.30617	8.846303	9.30617	8.846303	9.114845	8.665007	9.114845	8.665007	9.185123	8.730467	6.860499	6.518667	9.30617	8.846303	9.30617	8.846303
387445	3739252	6.951653	6.708785	9.436802	9.107648	9.436802	9.107648	9.235819	8.914749	9.235819	8.914749	9.303329	8.979895	6.951653	6.708785	9.436802	9.107648	9.436802	9.107648
389789	3736894	6.690782	6.404419	9.102391	8.711004	9.102391	8.711004	8.89302	8.513858	8.89302	8.513858	8.948209	8.567873	6.690782	6.404419	9.102391	8.711004	9.102391	8.711004
387455	3740696	6.890148	6.507091	9.346479	8.831241	9.346479	8.831241	9.153614	8.649901	9.153614	8.649901	9.224037	8.714929	6.890148	6.507091	9.346479	8.831241	9.346479	8.831241
386939	3743260	6.316278	6.143309	8.566481	8.33357	8.566481	8.33357	8.398702	8.169988	8.398702	8.169988	8.465275	8.234072	6.316278	6.143309	8.566481	8.33357	8.566481	8.33357
390450	3740328	5.805166	5.56084	7.900299	7.570651	7.900299	7.570651	7.727201	7.40759	7.727201	7.40759	7.775449	7.453219	5.805166	5.56084	7.900299	7.570651	7.900299	7.570651
380445	3733657	18.51874	17.75433	24.91955	23.89175	24.91955	23.89175	24.48964	23.48039	24.48964	23.48039	24.76692	23.74599	18.51874	17.75433	24.91955	23.89175	24.91955	23.89175
389709	3742434	5.808585	5.461693	7.894425	7.429046	7.894425	7.429046	7.726948	7.273251	7.726948	7.273251	7.780022	7.321186	5.808585	5.461693	7.894425	7.429046	7.894425	7.429046
389709	3742485	5.824165	5.469927	7.915453	7.44012	7.915453	7.44012	7.747458	7.284091	7.747458	7.284091	7.800708	7.332147	5.824165	5.469927	7.915453	7.44012	7.915453	7.44012
389401	3740862	5.931341	5.770762	8.064875	7.848583	8.064875	7.848583	7.891115	7.680335	7.891115	7.680335	7.943539	7.730716	5.931341	5.770762	8.064875	7.848583	8.064875	7.848583
381762	3737740	17.19776	16.58465	23.10328	22.28009	23.10328	22.28009	22.69587	21.88658	22.69587	21.88658	22.96613	22.14686	17.19776	16.58465	23.10328	22.28009	23.10328	22.28009
380296	3733115	17.12979	16.5304	23.07583	22.27051	23.07583	22.27051	22.68163	21.89024	22.68163	21.89024	22.92924	22.12849	17.12979	16.5304	23.07583	22.27051	23.07583	22.27051
381348	3733563	25.56499	24.60195	34.29996	33.00936	34.29996	33.00936	33.69694	32.42961	33.69694	32.42961	34.11504	32.83158	25.56499	24.60195	34.29996	33.00936	34.29996	33.00936
389119	3738782	6.603487	6.43485	8.980146	8.749392	8.980146	8.749392	8.780137	8.554532	8.780137	8.554532	8.836953	8.610426	6.603487	6.43485	8.980146	8.749392	8.980146	8.749392
387192	3740865	6.871786	6.611733	9.320577	8.970647	9.320577	8.970647	9.130728	8.787742	9.130728	8.787742	9.201731	8.855005	6.871786	6.611733	9.320577	8.970647	9.320577	8.970647

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
389648	3738051	6.667845	6.397777	9.071717	8.705218	9.071717	8.705218	8.865393	8.510344	8.865393	8.510344	8.920581	8.563456	6.667845	6.397777	9.071717	8.705218	9.071717	8.705218
389498	3740798	5.899604	5.72686	8.022798	7.789785	8.022798	7.789785	7.84985	7.623249	7.84985	7.623249	7.901582	7.672994	5.899604	5.72686	8.022798	7.789785	8.022798	7.789785
389398	3742733	5.888588	5.519791	8.000949	7.50514	8.000949	7.50514	7.833573	7.350437	7.833573	7.350437	7.888566	7.400393	5.888588	5.519791	8.000949	7.50514	8.000949	7.50514
378579	3732386	9.190454	8.913584	12.49938	12.11828	12.49938	12.11828	12.30834	11.93183	12.30834	11.93183	12.40099	12.02316	9.190454	8.913584	12.49938	12.11828	12.49938	12.11828
387231	3740475	7.023652	6.658757	9.525541	9.034919	9.525541	9.034919	9.32995	8.849345	9.32995	8.849345	9.402645	8.916683	7.023652	6.658757	9.525541	9.034919	9.525541	9.034919
378821	3734136	11.78242	11.43562	15.94062	15.46919	15.94062	15.46919	15.68077	15.21681	15.68077	15.21681	15.82792	15.36038	11.78242	11.43562	15.94062	15.46919	15.94062	15.46919
390456	3738401	6.279571	6.055204	8.549126	8.241033	8.549126	8.241033	8.355909	8.056046	8.355909	8.056046	8.405975	8.105505	6.279571	6.055204	8.549126	8.241033	8.549126	8.241033
389285	3742656	5.900044	5.577223	8.016084	7.581756	8.016084	7.581756	7.84896	7.425221	7.84896	7.425221	7.904315	7.476215	5.900044	5.577223	8.016084	7.581756	8.016084	7.581756
390278	3738221	6.359968	6.164335	8.658097	8.388636	8.658097	8.388636	8.462574	8.199738	8.462574	8.199738	8.513499	8.25033	6.359968	6.164335	8.658097	8.388636	8.658097	8.388636
387154	3741415	6.677777	6.461724	9.058942	8.767948	9.058942	8.767948	8.875135	8.590592	8.875135	8.590592	8.94371	8.656233	6.677777	6.461724	9.058942	8.767948	9.058942	8.767948
387349	3740831	6.858371	6.532397	9.30316	8.864585	9.30316	8.864585	9.112324	8.683305	9.112324	8.683305	9.182677	8.749106	6.858371	6.532397	9.30316	8.864585	9.30316	8.864585
390005	3740389	5.934036	5.674397	8.073179	7.722895	8.073179	7.722895	7.896384	7.555539	7.896384	7.555539	7.946643	7.602802	5.934036	5.674397	8.073179	7.722895	8.073179	7.722895
388555	3741719	6.159685	5.862569	8.364349	7.964448	8.364349	7.964448	8.191724	7.800807	8.191724	7.800807	8.251445	7.856463	6.159685	5.862569	8.364349	7.964448	8.364349	7.964448
389478	3741347	5.84396	5.676063	7.945505	7.718933	7.945505	7.718933	7.775616	7.555346	7.775616	7.555346	7.827687	7.605523	5.84396	5.676063	7.945505	7.718933	7.945505	7.718933
387541	3742481	6.32333	5.999177	8.580493	8.145567	8.580493	8.145567	8.407905	7.981393	8.407905	7.981393	8.472178	8.040505	6.32333	5.999177	8.580493	8.145567	8.580493	8.145567
378848	3734004	11.85225	11.57548	16.03552	15.6573	16.03552	15.6573	15.774	15.40181	15.774	15.40181	15.92182	15.5476	11.85225	11.57548	16.03552	15.6573	16.03552	15.6573
390388	3740918	5.802299	5.51936	7.895937	7.513979	7.895937	7.513979	7.723153	7.352338	7.723153	7.352338	7.771604	7.397732	5.802299	5.51936	7.895937	7.513979	7.895937	7.513979
390475	3738176	6.357485	6.049852	8.655108	8.234915	8.655108	8.234915	8.457945	8.051234	8.457945	8.051234	8.508415	8.100417	6.357485	6.049852	8.655108	8.234915	8.655108	8.234915
381635	3738433	15.518	14.92983	20.86284	20.0729	20.86284	20.0729	20.49539	19.71775	20.49539	19.71775	20.73336	19.94617	15.518	14.92983	20.86284	20.0729	20.86284	20.0729
380863	3732991	19.84727	18.88962	26.69288	25.41165	26.69288	25.41165	26.22815	24.96922	26.22815	24.96922	26.52977	25.25387	19.84727	18.88962	26.69288	25.41165	26.69288	25.41165
378541	3733938	10.70622	10.45643	14.5073	14.16412	14.5073	14.16412	14.27451	13.93658	14.27451	13.93658	14.40041	14.06122	10.70622	10.45643	14.5073	14.16412	14.5073	14.16412
379271	3732975	12.67011	12.14111	17.13724	16.42317	17.13724	16.42317	16.85756	16.15438	16.85756	16.15438	17.01733	16.3068	12.67011	12.14111	17.13724	16.42317	17.13724	16.42317
379853	3731187	11.90446	11.60855	16.13695	15.72981	16.13695	15.72981	15.87861	15.47639	15.87861	15.47639	16.01659	15.6129	11.90446	11.60855	16.13695	15.72981	16.13695	15.72981
384770	3739365	9.245046	8.872569	12.49553	11.99471	12.49553	11.99471	12.25542	11.76417	12.25542	11.76417	12.36955	11.87271	9.245046	8.872569	12.49553	11.99471	12.49553	11.99471
389448	3738624	6.587843	6.358302	8.948196	8.648077	8.948196	8.648077	8.747003	8.454013	8.747003	8.454013	8.802581	8.508291	6.587843	6.358302	8.960526	8.648077	8.960526	8.648077
383095	3739869	10.97718	10.48051	14.8032	14.13425	14.8032	14.13425	14.52289	13.87734	14.52289	13.87734	14.68312	14.02055	10.97718	10.48051	14.8032	14.13425	14.8032	14.13425
379660	3734797	15.36133	14.77095	20.70014	19.90432	20.70014	19.90432	20.35178	19.56829	20.35178	19.56829	20.57232	19.78026	15.36133	14.77095	20.70014	19.90432	20.70014	19.90432
380681	3734795	22.37591	21.61298	30.04157	29.0167	30.04157	29.0167	29.52144	28.51335	29.52144	28.51335	29.88124	28.86098	22.37591	21.61298	30.04157	29.0167	30.04157	29.0167
386724	3740057	7.394416	7.085113	10.0231	9.606747	10.0231	9.606747	9.81843	9.410165	9.81843	9.410165	9.897108	9.484413	7.394416	7.085113	10.0231	9.606747	10.0231	9.606747
388765	3741760	6.147594	5.800664	8.3489	7.882867	8.3489	7.882867	8.174852	7.719218	8.174852	7.719218	8.233832	7.773081	6.147594	5.800664	8.3489	7.882867	8.3489	7.882867
383099	3740817	9.870656	9.576859	13.32289	12.92531	13.32289	12.92531	13.08091	12.69173	13.08091	12.69173	13.21174	12.81922	9.870656	9.576859	13.32289	12.92531	13.32289	12.92531
390224	3740330	5.871437	5.638786	7.989445	7.674915	7.989445	7.674915	7.814407	7.50965	7.814407	7.50965	7.863603	7.556611	5.871437	5.638786	7.989445	7.674915	7.989445	7.674915
380154	3733793	17.07141	16.50697	22.99153	22.22962	22.99153	22.22962	22.59828	21.84909	22.59828	21.84909	22.84702	22.09025	17.07141	16.50697	22.99153	22.22962	22.99153	22.22962
389538	3740963	5.864969	5.684802	7.975516	7.732793	7.975516	7.732793	7.803905	7.567673	7.803905	7.567673	7.855452	7.616994	5.864969	5.684802	7.975516	7.732793	7.975516	7.732793
388714	3737260	7.113264	6.838051	9.670145	9.29709	9.670145	9.29709	9.449114	9.087371	9.449114	9.087371	9.510609	9.146536	7.113264	6.838051	9.670145	9.29709	9.670145	9.29709
378649	3736024	12.37639	11.94592	16.71488	16.12693	16.71488	16.12693	16.43961	15.8613	16.43961	15.8613	16.60457	16.02287	12.37639	11.94592	16.71488	16.12693	16.71488	16.12693
389879	3739303	6.224757	6.011695	8.469512	8.162301	8.469512	8.162301	8.281179	7.982714	8.281179	7.982714	8.333146	8.032862	6.224757	6.011695	8.469512	8.162301	8.469512	8.162301
378441	3735152	10.4899	10.11775	14.20136	13.6956	14.20136	13.6956	13.97203	13.47365	13.97203	13.47365	14.09984	13.59761	10.4899	10.11775	14.20136	13.6956	14.20136	13.6956
388749	3737794	6.870821	6.717024	9.341647	9.131262	9.341647	9.131262	9.131208	8.926206	9.131208	8.926206	9.190696	8.98495	6.870821	6.717024	9.341647	9.131262	9.341647	9.131262
383262	3739680	11.05879	10.41856	14.91199	14.0533	14.91199	14.0533	14.63887	13.79691	14.63887	13.79691	14.79043	13.93809	11.05879	10.41856	14.91199	14.0533	14.91199	14.0533
389624	3738317	6.611145	6.387899	8.994422	8.690295	8.994422	8.690295	8.790876	8.495851	8.790876	8.495851	8.845816	8.549436	6.611145	6.387899	8.994422	8.690295	8.994422	8.690295
382778	3739398	12.07318	11.50864	16.26691	15.50805	16.26691	15.50805	15.97271	15.22741	15.97271	15.22741	16.14355	15.38954	12.07318	11.50864	16.26691	15.50805	16.26691	15.50805
382757	3737606	14.98169	14.12949	20.14897	19.0088	20.14897	19.0088	19.78461	18.66425	19.78461	18.66425	20.0102	18.87464	14.98169	14.12949	20.14897	19.0088	20.14897	19.0088
382820	3738093	13.88218	13.12674	18.68076	17.66988	18.68076	17.66988	18.3425	17.34861	18.3425	17.34861	18.54753	17.5402	13.88218	13.12674	18.68076	17.66988	18.68076	17.66988
389389	3738887	6.542992	6.294649	8.899118	8.561247	8.899118	8.561247	8.699813	8.371818	8.699813	8.371818	8.755476	8.425777	6.542992	6.295669	8.899118	8.561247	8.899118	8.561247
382180	3739100	13.35432	12.54136	17.97459	16.88573	17.97459	16.88573	17.65491	16.58356	17.65491	16.58356	17.85158	16.766	13.35432	12.54136	17.97459	16.88573	17.97459	16.88573
379361	3740015	11.99903	11.52861	16.16893	15.53765	16.16893	15.53765	15.8937	15.27302	15.8937	15.27302	16.06558	15.43718	11.99903	11.52861	16.16893	15.53765	16.16893	15.53765
380824	3735170	23.85492	23.17524	32.00193	31.08967	32.00193	31.08967	31.44827	30.55145	31.44827	30.55145	31.84129	30.93332	23.85492	23.17524	32.00193	31.08967	32.00193	31.08967
383174	3739290	11.66254	10.9447	15.7191	14.7575	15.7191	14.7575	15.43067	14.48755	15.43067	14.48755	15.59312	14.63776	11.66254	10.9447	15.7191	14.7575	15.7191	14.7575
381835	3737984	16.32866	15.85636	21.94411	21.30878	21.94411	21.30878	21.55695	20.93118	21.55695	20.93118	21.81041	21.17738	16.32866	15.85636	21.94411	21.30878	21.94411	21.30878
389535	3741054	5.864364	5.699604	7.974563	7.752512	7.974563	7.752512	7.803005	7.586738	7.803005	7.586738	7.85459	7.636296	5.864364	5.699604	7.974563	7.752512	7.974563	7.752512
379332	3734589	13.33721	12.85122	18.00373	17.34685	18.00373	17.34685	17.70389	17.0578	17.70389	17.0578	17.88426	17.23198	13.33721	12.85122	18.00373	17.34685	18.00373	17.34685
389714	3737893	6.654386	6.383096	9.054727	8.68607	9.054727	8.68607	8.848764	8.491498	8.848764	8.491498	8.90334	8.544155	6.654386	6.383096	9.054727	8.68607	9.054727	8.68607
379760	3736916	16.62622	15.90824	22.36286	21.39554	22.36286	21.39554	21.9815	21.02864	21.9815	21.02864	22.23477	21.2712	16.62622	15.90824	22.36286	21.39554	22.36286	21.39554
389686	3741436	5.755038	5.602826	7.826424	7.6209	7.826424	7.6209	7.658753	7.458761	7.658753	7.458761	7.709286	7.507615	5.755038	5.602826	7.826424	7.6209	7.826424	7.6209
387943	3742041	6.317313	6.007085	8.57495	8.15723	8.57495	8.15723	8.399637	7.991413	8.399637	7.991413	8.462427	8.050022	6.317313	6.007085	8.57495	8.15723	8.57495	8.15723
387255	3739936	7.091586	6.651013	9.619339	9.026506	9.619339	9.026506	9.419225	8.839214	9.419225	8.839214	9.491608	8.90541	7.091586	6.651013	9.619339	9.026506	9.619339	9.026506
389235	3740749	5.999268	5.807106	8.156151	7.897423	8.156151	7.897423	7.980437	7.729009	7.980437	7.729009	8.033871	7.780069	5.999268	5.807106	8.156151	7.897423	8.156151	7.897423
379517	3732375	12.5427	12.26393	16.97218	16.59133	16.97218	16.59133	16.69654	16.32047	16.69654	16.32047	16.85225	16.47383	12.5427	12.26393	16.97218	16.59133	16.97218	16.59133
380014	3733758	16.20021	15.76963	21.83188	21.24866	21.83188	21.24866	21.46008	20.88624	21.46008	20.88624	21.69147	21.11245	16.20021	15.76963	21.83188	21.24866	21.83188	21.24866
379495	3737075	15.42649	14.64563	20.76779	19.71402	20.76779	19.71402	20.41517	19.37761	20.41517	19.37761	20.64359	19.59508	15.42649	14.64563	20.76779	19.71402	20.76779	19.71402
380299	3740161	12.09325	11.58856	16.29067	15.61343	16.29067	15.61343	16.00929	15.34363	16.00929	15.34363	16.1837	15.50981	12.09325	11.58856	16.29067	15.61343	16.29067	15.61343
380257	3740403	11.80181	11.24926	15.90114	15.08384	15.90114	15.08384	15.62665	14.82289	15.62665	14.82289	15.7958	14.98171	11.80181	11.2933	15.90114	15.08384	15.90114	15.08384
389875	3741853	5.804839	5.624464	7.893622	7.649972	7.893622	7.649972	7.72436	7.486616	7.72436	7.486616	7.775514	7.535692	5.804839	5.624464	7.893622	7.649972	7.893622	7.649972
381988	3739995	11.9051	11.30095	16.03784	15.22728	16.03784	15.22728	15.75376	14.95641	15.75376	14.95641	15.92416	15.11675	11.9051	11.30095	16.03784	15.22728	16.03784	15.22728
379279	3735517	14.25765	13.65559	19.22447	18.41029	19.22447	18.41029	18.90206	18.10084	18.90206	18.10084	19.10267	18.29379	14.25765	13.65559	19.22447	18.41029	19.22447	18.41029
383239	3739989	10.62868	10.1633	14.33623	13.71033	14.33623	13.71033	14.07438	13.46066	14.07438	13.46066	14.21857	13.5979	10.63657	10.1633	14.33623	13.71084	14.33623	13.71084
390353	3739073	6.144775	5.930341	8.363883	8.071856	8.363883	8.071856	8.17751	7.893977	8.17751	7.893977	8.227581	7.942666	6.144775	5.930341	8.363883	8.071856	8.363883	8.071856
381187	3734118	25.86545	25.23592	34.69025	33.84511	34.69025	33.84511	34.08305	33.25299	34.08305	33.25299	34.51126	33.67116	25.86545	25.23592	34.69025	33.84511	34.69025	33.84511
380461	3731193	14.51153	14.26661	19.61054	19.27227	19.61054	19.27227	19.28511	18.95016	19.28511	18.95016	19.47353	19.1378	14.51153	14.26661	19.61054	19.27227	19.61054	19.27227
380049	3733031	15.87478	15.51626	21.40652	20.92171	21.40652	20.92171	21.04374	20.56792	21.04374	20.56792	21.26582	20.78558	15.87478	15.51626	21.40652	20.92171	21.40652	20.92171
389106	3738800	6.585189	6.419403	8.955272	8.728298	8.955272	8.728298	8.755961	8.53437	8.755961	8.53437	8.812636	8.590239	6.585189	6.419403	8.955272	8.728298	8.955272	8.728298
387111	3740236	7.122214	6.752608	9.65837	9.161437	9.65837	9.161437	9.460349	8.972719	9.460349	8.972719	9.534438	9.041213	7.122214	6.752608	9.65837	9.161437	9.65837	9.161437
389796	3738044	6.595573	6.331036	8.975088	8.615527	8.975088	8.615527	8.771461	8.423026	8.771461	8.423026	8.825499	8.475227	6.595573	6.331036	8.975088	8.615527	8.975088	8.615527
379594	3738367	14.20149	13.76041	19.123	18.52244	19.123	18.52244	18.79783	18.20645	18.79783	18.20645	19.00646	18.4107	14.20149	13.76041	19.123	18.52244	19.123	18.52244
390160	3739058	6.253955	6.023025	8.510654	8.196876	8.510654	8.196876	8.320106	8.015772	8.320106	8.015772	8.371589	8.06557	6.253955	6.023025	8.510654	8.196876	8.510654	8.196876
382425	3738317	14.52054	13.83929	19.53221	18.61895	19.53221	18.61895	19.18274	18.28453	19.18274	18.28453	19.40069	18.49088	14.52054	13.83929	19.53221	18.61895	19.53221	18.61895
379699	3732970	14.10276	13.85252	19.04663	18.70477	19.04663	18.70477	18.72916	18.39316	18.72916	18.39316	18.91643	18.57858	14.10276	13.85252	19.04663	18.70477	19.04663	18.70477
379666	3731426	11.81513	11.58177	16.01622	15.69151	16.01622	15.69151	15.76055	15.43858	15.76055	15.43858	15.89737	15.57532	11.81513	11.58177	16.01622	15.69151	16.01622	15.69151
379935	3736833	17.24622	16.5161	23.18715	22.20457	23.18715	22.20457	22.78966	21.82244	22.78966	21.82244	23.0556	22.07725	17.24622	16.5161	23.18715	22.20457	23.18715	22.20457
387156	3740295	7.091333	6.724543	9.616796	9.123652	9.616796	9.123652	9.41937	8.935611	9.41937	8.935611	9.492979	9.003714	7.091333	6.724543	9.616796	9.123652	9.616796	9.123652
390248	3737371	6.652373	6.27662	9.054153	8.543331	9.054153	8.543331	8.845651	8.352064	8.845651	8.352064	8.898991	8.403073	6.652373	6.27662	9.054153	8.543331	9.054153	8.543331
390538	3737763	6.433235	6.0898	8.7584	8.291199	8.7584	8.291199	8.558366	8.10686	8.558366	8.10686	8.609309	8.155741	6.433235	6.0898	8.7584	8.291199	8.7584	8.291199
387420	3740551	6.936129	6.534867	9.408675	8.869042	9.408675	8.869042	9.214182	8.686475	9.214182	8.686475	9.285098	8.751676	6.936129	6.534867	9.408675	8.869042	9.408675	8.869042
379821	3736524	17.07739	16.21495	22.96915	21.80849	22.96915	21.80849	22.5765	21.43468	22.5765	21.43468	22.83664	21.68177	17.07739	16.21495	22.96915	21.80849	22.96915	21.80849
389624	3738615	6.523513	6.321371	8.874967	8.599087	8.874967	8.599087	8.675701	8.407982	8.675701	8.407982	8.730248	8.461475	6.523513	6.321371	8.874967	8.599087	8.874967	8.599087
378750	3733896	11.3741	11.11056	15.39856	15.03783	15.39856	15.03783	15.14926	14.79412	15.14926	14.79412	15.28769	14.93088	11.3741	11.11056	15.39856	15.03783	15.39856	15.03783

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
390276	3738162	6.382474	6.179734	8.688636	8.409426	8.688636	8.409426	8.491923	8.219876	8.491923	8.219876	8.542977	8.270648	6.382474	6.179734	8.688636	8.409426	8.688636	8.409426
380498	3740249	12.01985	11.62965	16.19172	15.66655	16.19172	15.66655	15.91175	15.39501	15.91175	15.39501	16.0851	15.56247	12.01985	11.62965	16.19172	15.66655	16.19172	15.66655
378867	3731455	10.30824	10.11939	14.01422	13.74976	14.01422	13.74976	13.79769	13.53578	13.79769	13.53578	13.90323	13.64198	10.30824	10.11939	14.01422	13.74976	14.01422	13.74976
378709	3734317	11.40114	11.1044	15.42998	15.02503	15.42998	15.02503	15.17961	14.78037	15.17961	14.78037	15.32022	14.91852	11.40114	11.1044	15.42998	15.02503	15.42998	15.02503
379694	3736911	16.26545	15.62543	21.8833	21.01942	21.8833	21.01942	21.51057	20.65949	21.51057	20.65949	21.75637	20.89632	16.26545	15.62543	21.8833	21.01942	21.8833	21.01942
387129	3741587	6.661637	6.403564	9.036324	8.689419	9.036324	8.689419	8.853629	8.513691	8.853629	8.513691	8.922403	8.578616	6.661637	6.403564	9.036324	8.689419	9.036324	8.689419
382074	3740337	11.37605	10.85028	15.3316	14.62554	15.3316	14.62554	15.05948	14.36532	15.05948	14.36532	15.21989	14.51733	11.37605	10.85028	15.3316	14.62554	15.3316	14.62554
384631	3739119	9.506702	9.156977	12.84525	12.37516	12.84525	12.37516	12.59924	12.13726	12.59924	12.13726	12.71817	12.25076	9.506702	9.156977	12.84525	12.37516	12.84525	12.37516
387444	3742469	6.392461	6.026459	8.672695	8.181917	8.672695	8.181917	8.498413	8.017359	8.498413	8.017359	8.564007	8.077052	6.392461	6.026459	8.672695	8.181917	8.672695	8.181917
386969	3740593	7.054965	6.771926	9.566555	9.185897	9.566555	9.185897	9.371507	8.99855	9.371507	8.99855	9.44529	9.068221	7.054965	6.771926	9.566555	9.185897	9.566555	9.185897
390180	3738228	6.371796	6.182849	8.673867	8.414046	8.673867	8.414046	8.478655	8.225096	8.478655	8.225096	8.529911	8.275852	6.371796	6.182849	8.673867	8.414046	8.673867	8.414046
384377	3739369	9.602986	9.276251	12.9732	12.53273	12.9732	12.53273	12.72565	12.29437	12.72565	12.29437	12.84673	12.41109	9.602986	9.276251	12.9732	12.53273	12.9732	12.53273
387724	3740376	6.77509	6.403638	9.194452	8.694929	9.194452	8.694929	9.002392	8.513598	9.002392	8.513598	9.069771	8.575646	6.77509	6.403638	9.194452	8.694929	9.194452	8.694929
390207	3737910	6.503205	6.248639	8.851943	8.503574	8.851943	8.503574	8.650237	8.311365	8.650237	8.311365	8.702437	8.362455	6.503205	6.248639	8.851943	8.503574	8.851943	8.503574
390631	3737633	6.360846	6.097257	8.66136	8.301276	8.66136	8.301276	8.464834	8.116255	8.464834	8.116255	8.514845	8.165159	6.360846	6.097257	8.66136	8.301276	8.66136	8.301276
390365	3737647	6.545183	6.175503	8.909311	8.406432	8.909311	8.406432	8.704813	8.218584	8.704813	8.218584	8.757035	8.268552	6.545183	6.175503	8.909311	8.406432	8.909311	8.406432
389921	3738609	6.44726	6.205141	8.773094	8.443516	8.773094	8.443516	8.575023	8.2557	8.575023	8.2557	8.62807	8.307241	6.44726	6.205141	8.773094	8.443516	8.773094	8.443516
389883	3738053	6.546612	6.318612	8.909417	8.598541	8.909417	8.598541	8.707669	8.405776	8.707669	8.405776	8.761007	8.457795	6.546612	6.318612	8.909417	8.598541	8.909417	8.598541
390052	3737368	6.723234	6.372139	9.149371	8.67114	9.149371	8.67114	8.938532	8.475172	8.938532	8.475172	8.992874	8.527471	6.723234	6.372139	9.149371	8.67114	9.149371	8.67114
389599	3738178	6.655092	6.428991	9.05393	8.746329	9.05393	8.746329	8.848544	8.550201	8.848544	8.550201	8.903867	8.604013	6.655092	6.428991	9.05393	8.746329	9.05393	8.746329
387995	3740853	6.614214	6.224446	8.977194	8.453328	8.977194	8.453328	8.789891	8.27797	8.789891	8.27797	8.855316	8.337796	6.614214	6.224446	8.977194	8.453328	8.977194	8.453328
378996	3739241	12.41232	11.99561	16.73042	16.166	16.73042	16.166	16.44748	15.89256	16.44748	15.89256	16.62387	16.06406	12.41232	11.99561	16.73042	16.166	16.73042	16.166
389600	3738360	6.602934	6.375472	8.9831	8.673181	8.9831	8.673181	8.780241	8.479738	8.780241	8.479738	8.835236	8.533388	6.602934	6.375472	8.9831	8.673181	8.9831	8.673181
390315	3739619	5.999811	5.805602	8.16558	7.902412	8.16558	7.902412	7.984416	7.711667	7.984416	7.711667	8.033792	7.75911	5.999811	5.805602	8.16558	7.902412	8.16558	7.902412
388103	3741683	6.380706	6.075305	8.661417	8.249593	8.661417	8.249593	8.482804	8.080394	8.482804	8.080394	8.545825	8.139542	6.380706	6.075305	8.661417	8.249593	8.661417	8.249593
390224	3738014	6.454834	6.23539	8.786588	8.485293	8.786588	8.485293	8.586957	8.293472	8.586957	8.293472	8.638688	8.344547	6.454834	6.23539	8.786588	8.485293	8.786588	8.485293
387926	3742882	6.100836	5.844268	8.282452	7.937125	8.282452	7.937125	8.114392	7.777402	8.114392	7.777402	8.174742	7.83433	6.100836	5.844268	8.282452	7.937125	8.282452	7.937125
388691	3740431	6.231765	5.990065	8.468071	8.142756	8.468071	8.142756	8.28648	7.971077	8.28648	7.971077	8.343647	8.025346	6.231765	5.990065	8.468071	8.142756	8.468071	8.142756
378469	3734936	10.44781	10.11098	14.14735	13.68288	14.14735	13.68288	13.91922	13.46179	13.91922	13.46179	14.04556	13.5848	10.44781	10.11098	14.14735	13.68288	14.14735	13.68288
387340	3741495	6.597504	6.383576	8.951591	8.663267	8.951591	8.663267	8.769865	8.487517	8.769865	8.487517	8.837017	8.55179	6.597504	6.383576	8.951591	8.663267	8.951591	8.663267
386718	3739983	7.40142	7.085014	10.03227	9.606369	10.03227	9.606369	9.827458	9.409683	9.827458	9.409683	9.906336	9.484003	7.40142	7.085014	10.03227	9.606369	10.03227	9.606369
380186	3733726	17.0681	16.50796	22.98784	22.23181	22.98784	22.23181	22.59433	21.85117	22.59433	21.85117	22.84277	22.09203	17.0681	16.50796	22.98784	22.23181	22.98784	22.23181
381264	3732980	22.47556	21.83889	30.18977	29.28404	30.18977	29.28404	29.65913	28.77072	29.65913	28.77072	30.01392	29.1145	22.47556	21.83889	30.18977	29.28404	30.18977	29.28404
388011	3741615	6.412348	6.119176	8.704011	8.308524	8.704011	8.308524	8.524977	8.138061	8.524977	8.138061	8.588515	8.197843	6.412348	6.119176	8.704011	8.308524	8.704011	8.308524
388112	3742445	6.136243	5.92301	8.331743	8.043543	8.331743	8.043543	8.161577	7.879959	8.161577	7.879959	8.221647	7.937568	6.136243	5.92301	8.331743	8.043543	8.331743	8.043543
387172	3741938	6.607858	6.276349	8.962562	8.517688	8.962562	8.517688	8.782241	8.34578	8.782241	8.34578	8.850893	8.409139	6.607858	6.276349	8.962562	8.517688	8.962562	8.517688
390062	3738250	6.431336	6.231408	8.753587	8.479823	8.753587	8.479823	8.556051	8.28921	8.556051	8.28921	8.608185	8.340443	6.431336	6.231408	8.753587	8.479823	8.753587	8.479823
389026	3737038	7.046972	6.831548	9.583501	9.28933	9.583501	9.28933	9.363114	9.077666	9.363114	9.077666	9.422544	9.136033	7.046972	6.831548	9.583501	9.28933	9.583501	9.28933
389481	3741039	5.878045	5.716883	7.992783	7.775673	7.992783	7.775673	7.820874	7.609282	7.820874	7.609282	7.87272	7.65911	5.878045	5.716883	7.992783	7.775673	7.992783	7.775673
380158	3734275	17.58069	16.93846	23.66321	22.79817	23.66321	22.79817	23.25954	22.40812	23.25954	22.40812	23.52123	22.66024	17.58069	16.93846	23.66321	22.79817	23.66321	22.79817
387982	3740075	6.608901	6.362822	8.973794	8.641915	8.973794	8.641915	8.783903	8.460845	8.783903	8.460845	8.847439	8.521466	6.608901	6.362822	8.973794	8.641915	8.973794	8.641915
378816	3733895	11.61895	11.30992	15.72507	15.30376	15.72507	15.30376	15.46976	15.05507	15.46976	15.05507	15.61293	15.19555	11.61895	11.30992	15.72507	15.30376	15.72507	15.30376
379745	3733311	14.85461	14.46863	20.04492	19.52258	20.04492	19.52258	19.70832	19.19507	19.70832	19.19507	19.91143	19.39353	14.85461	14.46863	20.04492	19.52258	20.04492	19.52258
380440	3733911	18.66729	18.04545	25.11385	24.27454	25.11385	24.27454	24.68197	23.85778	24.68197	23.85778	24.96366	24.13072	18.66729	18.04545	25.11385	24.27544	25.11385	24.27544
387611	3742700	6.271807	5.927122	8.510798	8.048511	8.510798	8.048511	8.339809	7.886599	8.339809	7.886599	8.40352	7.944748	6.271807	5.927122	8.510798	8.048511	8.510798	8.048511
387731	3741753	6.473563	6.151948	8.785098	8.352118	8.785098	8.352118	8.605208	8.182284	8.605208	8.182284	8.670232	8.242987	6.473563	6.151948	8.785098	8.352118	8.785098	8.352118
388870	3737870	6.877723	6.683322	9.351461	9.086619	9.351461	9.086619	9.140042	8.883016	9.140042	8.883016	9.199312	8.941094	6.877723	6.683322	9.351461	9.086619	9.351461	9.086619
389981	3738882	6.361434	6.130203	8.656062	8.341465	8.656062	8.341465	8.461601	8.156751	8.461601	8.156751	8.514179	8.207838	6.361434	6.130203	8.656062	8.341465	8.656062	8.341465
388635	3741379	6.245512	5.890084	8.481858	8.004736	8.481858	8.004736	8.304194	7.837876	8.304194	7.837876	8.363981	7.892332	6.245512	5.890084	8.481858	8.004736	8.481858	8.004736
388088	3740588	6.536489	6.219289	8.874437	8.447875	8.874437	8.447875	8.688071	8.271424	8.688071	8.271424	8.751529	8.33044	6.536489	6.219289	8.874437	8.447875	8.874437	8.447875
387556	3739981	6.875459	6.562045	9.330571	8.908196	9.330571	8.908196	9.135317	8.721866	9.135317	8.721866	9.203663	8.78604	6.875459	6.562045	9.330571	8.908196	9.330571	8.908196
387009	3743355	6.280788	6.103319	8.518875	8.279923	8.518875	8.279923	8.351654	8.117198	8.351654	8.117198	8.417607	8.180611	6.280788	6.103319	8.518875	8.279923	8.518875	8.279923
387670	3740411	6.802333	6.423884	9.230579	8.721671	9.230579	8.721671	9.038603	8.540042	9.038603	8.540042	9.10671	8.6026	6.802333	6.423884	9.230579	8.721671	9.230579	8.721671
390403	3740229	5.839768	5.604531	7.947128	7.629594	7.947128	7.629594	7.772783	7.465085	7.772783	7.465085	7.821407	7.511229	5.839768	5.604531	7.947128	7.629594	7.947128	7.629594
382216	3739181	13.23755	12.43151	17.81869	16.73888	17.81869	16.73888	17.50128	16.4392	17.50128	16.4392	17.69567	16.61959	13.23755	12.43151	17.81869	16.73888	17.81869	16.73888
378878	3732123	10.01985	9.74991	13.61174	13.24036	13.61174	13.24036	13.4009	13.03379	13.4009	13.03379	13.50722	13.13874	10.01985	9.74991	13.61174	13.24036	13.61174	13.24036
389425	3742800	5.87594	5.507796	7.984018	7.488926	7.984018	7.488926	7.816978	7.334624	7.816978	7.334624	7.871755	7.384435	5.87594	5.507796	7.984018	7.488926	7.984018	7.488926
379320	3739551	12.32712	12.10098	16.61166	16.30348	16.61166	16.30348	16.32841	16.02616	16.32841	16.02616	16.50464	16.20048	12.32712	12.10098	16.61166	16.30348	16.61166	16.30348
380519	3733982	19.36154	18.67074	26.03739	25.08837	26.03739	25.08837	25.58789	24.65541	25.58789	24.65541	25.88366	24.94076	19.36154	18.67074	26.03739	25.08837	26.03739	25.08837
378626	3738189	11.68876	10.9893	15.7766	14.82887	15.7766	14.82887	15.51546	14.58213	15.51546	14.58213	15.6745	14.73284	11.68876	10.9893	15.7766	14.82887	15.7766	14.82887
381827	3738004	16.27044	15.78368	21.86637	21.21178	21.86637	21.21178	21.48055	20.83592	21.48055	20.83592	21.73301	21.08069	16.27044	15.78368	21.86637	21.21178	21.86637	21.21178
388688	3740334	6.252601	6.02829	8.496773	8.194744	8.496773	8.194744	8.314031	8.021114	8.314031	8.021114	8.371179	8.075585	6.252601	6.02829	8.496773	8.194744	8.496773	8.194744
388894	3740733	6.143413	5.934198	8.348645	8.067051	8.348645	8.067051	8.169558	7.896184	8.169558	7.896184	8.22567	7.949739	6.143413	5.934198	8.348645	8.067051	8.348645	8.067051
388832	3740311	6.216219	5.962871	8.448392	8.107081	8.448392	8.107081	8.265601	7.935187	8.265601	7.935187	8.321822	7.988582	6.216219	5.962871	8.448392	8.107081	8.448392	8.107081
381603	3740192	11.95326	11.45499	16.10158	15.43165	16.10158	15.43165	15.81744	15.16005	15.81744	15.16005	15.98916	15.32426	11.95326	11.45499	16.10158	15.43165	16.10158	15.43165
387506	3739696	6.924388	6.666704	9.39778	9.049179	9.39778	9.049179	9.199851	8.859427	9.199851	8.859427	9.268191	8.92494	6.924388	6.666704	9.39778	9.049179	9.39778	9.049179
390444	3739033	6.114155	5.945197	8.32304	8.091605	8.32304	8.091605	8.137518	7.91203	8.137518	7.91203	8.187009	7.960812	6.114155	5.945197	8.32304	8.091605	8.32304	8.091605
378938	3731817	10.33773	10.05213	14.0426	13.64845	14.0426	13.64845	13.82526	13.43492	13.82526	13.43492	13.93534	13.54389	10.33773	10.05213	14.0426	13.64845	14.0426	13.64845
390594	3738247	6.296742	5.974237	8.573037	8.132892	8.573037	8.132892	8.37791	7.952374	8.37791	7.952374	8.427708	8.000742	6.296742	5.974237	8.573037	8.132892	8.573037	8.132892
388725	3741155	6.196162	5.901455	8.41694	8.021324	8.41694	8.021324	8.239424	7.853531	8.239424	7.853531	8.297763	7.907571	6.196162	5.901455	8.41694	8.021324	8.41694	8.021324
380203	3736551	18.04809	17.57703	24.25185	23.61513	24.25185	23.61513	23.83443	23.20787	23.83443	23.20787	24.11738	23.48469	18.04809	17.57703	24.25185	23.61513	24.25185	23.61513
390195	3739970	5.974364	5.728536	8.129351	7.797183	8.129351	7.797183	7.950328	7.628208	7.950328	7.628208	8.000294	7.675686	5.974364	5.728536	8.129351	7.797183	8.129351	7.797183
388192	3740542	6.470344	6.185099	8.78621	8.402542	8.78621	8.402542	8.601744	8.227289	8.601744	8.227289	8.663984	8.285612	6.470344	6.185099	8.78621	8.402542	8.78621	8.402542
383107	3737969	13.21404	12.59348	17.79107	16.96003	17.79107	16.96003	17.46481	16.64854	17.46481	16.64854	17.65579	16.82898	13.21404	12.59348	17.79107	16.96003	17.79107	16.96003
389940	3740373	5.95602	5.698572	8.102802	7.75558	8.102802	7.75558	7.925537	7.587639	7.925537	7.587639	7.976138	7.635202	5.95602	5.698572	8.102802	7.75558	8.102802	7.75558
390373	3740260	5.843554	5.596359	7.952106	7.618466	7.952106	7.618466	7.777707	7.454297	7.777707	7.454297	7.826422	7.500406	5.843554	5.596359	7.952106	7.618466	7.952106	7.618466
390533	3740347	5.77791	5.550777	7.863737	7.55726	7.863737	7.55726	7.691611	7.39449	7.691611	7.39449	7.73947	7.439914	5.77791	5.550777	7.863737	7.55726	7.863737	7.55726
389282	3739139	6.315778	6.121327	8.589609	8.324802	8.589609	8.324802	8.400201	8.141171	8.400201	8.141171	8.454578	8.194001	6.315778	6.121327	8.589609	8.324802	8.589609	8.324802
378807	3734759	11.48677	11.15463	15.53598	15.08414	15.53598	15.08414	15.28227	14.83731	15.28227	14.83731	15.42739	14.97909	11.48677	11.15463	15.53598	15.08414	15.53598	15.08414
388084	3742865	6.020683	5.810292	8.175763	7.891651	8.175763	7.891651	8.009252	7.732452	8.009252	7.732452	8.067927	7.788727	6.020683	5.810292	8.175763	7.891651	8.175763	7.891651
388917	3737693	6.921707	6.667749	9.411394	9.066791	9.411394	9.066791	9.197494	8.863701	9.197494	8.863701	9.256913	8.921156	6.921707	6.667749	9.411394	9.066791	9.411394	9.066791
379706	3740182	11.79261	11.59472	15.89213	15.624	15.89213	15.624	15.61921	15.35596	15.61921	15.35596	15.78716	15.52171	11.79261	11.59472	15.89213	15.624	15.89213	15.624
388856	3738266	6.841655	6.681718	9.302094	9.07662	9.302094	9.07662	9.093681	8.873838	9.093681	8.873838	9.153062	8.932375	6.841655	6.681718	9.302094	9.07662	9.302094	9.07662
380807	3733760	20.76822	20.2966	27.91193	27.27498	27.91193	27.27498	27.42606	26.80154	27.42606	26.80154	27.749	27.11846	20.76822	20.2966	27.91193	27.27498	27.91193	27.27498
379507	3732828	13.27921	12.60437	17.94994	17.04167	17.94994	17.04167	17.65507	16.76079	17.65507	16.76079	17.82637	16.92172	13.27921	12.60437	17.94994	17.04167	17.94994	17.04167
390021	3738204	6.464144	6.252147	8.797962	8.508114	8.797962	8.508114	8.599215	8.316887	8.599215	8.316887	8.651676	8.368258	6.464144	6.252147	8.797962	8.508114	8.797962	8.508114
388005	3742146	6.262375	5.980857	8.501073	8.121782	8.501073	8.121782	8.327439	7.956436	8.327439	7.956436	8.389459	8.014692	6.262375	5.980857	8.501073	8.121782	8.501073	8.121782

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
382973	3739597	11.43438	11.09193	15.41465	14.95159	15.41465	14.95159	15.13438	14.67964	15.13438	14.67964	15.29275	14.83391	11.43438	11.09193	15.41465	14.95159	15.41465	14.95159
379841	3740022	12.09501	11.81239	16.29397	15.91305	16.29397	15.91305	16.0142	15.63964	16.0142	15.63964	16.18865	15.80998	12.09501	11.81239	16.29397	15.91305	16.29397	15.91305
389258	3739250	6.285745	6.125516	8.548204	8.329536	8.548204	8.329536	8.360467	8.146084	8.360467	8.146084	8.414914	8.199348	6.285745	6.125516	8.548204	8.329536	8.548204	8.329536
388234	3742867	5.967947	5.792995	8.10546	7.868536	8.10546	7.868536	7.940146	7.70892	7.940146	7.70892	7.997781	7.764749	5.967947	5.792995	8.10546	7.868536	8.10546	7.868536
382152	3737824	16.29729	15.32749	21.90173	20.60349	21.90173	20.60349	21.51301	20.23663	21.51301	20.23663	21.76565	20.47224	16.29729	15.32749	21.90173	20.60349	21.90173	20.60349
378944	3734805	11.98996	11.50973	16.20616	15.55681	16.20616	15.55681	15.93949	15.30095	15.93949	15.30095	16.09448	15.44984	11.98996	11.50973	16.20616	15.55681	16.20616	15.55681
389533	3741212	5.82398	5.680376	7.919575	7.725777	7.919575	7.725777	7.749552	7.560848	7.749552	7.560848	7.800878	7.610511	5.82398	5.680376	7.919575	7.725777	7.919575	7.725777
388859	3742514	5.944891	5.677324	8.075197	7.714321	8.075197	7.714321	7.908912	7.556207	7.908912	7.556207	7.965692	7.609593	5.944891	5.677324	8.075197	7.714321	8.075197	7.714321
389020	3739872	6.255975	6.055762	8.504452	8.2338	8.504452	8.2338	8.319376	8.054926	8.319376	8.054926	8.375047	8.108311	6.255975	6.055762	8.504452	8.2338	8.504452	8.2338
389472	3740264	6.023568	5.80347	8.191514	7.89466	8.191514	7.89466	8.013718	7.724089	8.013718	7.724089	8.066289	7.773959	6.023568	5.80347	8.191514	7.89466	8.191514	7.89466
379181	3735610	13.93263	13.33606	18.79072	17.98351	18.79072	17.98351	18.47645	17.68206	18.47645	17.68206	18.67087	17.86916	13.93263	13.33606	18.79072	17.98351	18.79072	17.98351
387188	3740575	6.987515	6.680301	9.476561	9.063318	9.476561	9.063318	9.282863	8.877655	9.282863	8.877655	9.355323	8.945606	6.987515	6.680301	9.476561	9.063318	9.476561	9.063318
389579	3738221	6.645957	6.429851	9.041511	8.74712	9.041511	8.74712	8.836676	8.551269	8.836676	8.551269	8.891958	8.60527	6.645957	6.429851	9.041511	8.74712	9.041511	8.74712
379407	3739022	13.10057	12.81433	17.64778	17.25702	17.64778	17.25702	17.34775	16.96246	17.34775	16.96246	17.53746	17.14976	13.10057	12.81433	17.64778	17.25702	17.64778	17.25702
390399	3739915	5.902326	5.683121	8.032766	7.736888	8.032766	7.736888	7.855601	7.568538	7.855601	7.568538	7.904399	7.614971	5.902326	5.683121	8.032766	7.736888	8.032766	7.736888
381871	3738620	14.42834	13.82901	19.40678	18.60266	19.40678	18.60266	19.06402	18.273	19.06402	18.273	19.28183	18.48078	14.42834	13.82901	19.40678	18.60266	19.40678	18.60266
380385	3733112	17.44378	16.86738	23.49375	22.71905	23.49375	22.71905	23.09059	22.32979	23.09059	22.32979	23.34446	22.57468	17.44378	16.86738	23.49375	22.71905	23.49375	22.71905
389036	3741241	6.045403	5.811763	8.214701	7.900612	8.214701	7.900612	8.039985	7.734883	8.039985	7.734883	8.095721	7.787599	6.045403	5.811763	8.214701	7.900612	8.214701	7.900612
379775	3731051	11.53173	11.24672	15.64326	15.25131	15.64326	15.25131	15.39431	15.00729	15.39431	15.00729	15.52386	15.1353	11.53173	11.24672	15.64326	15.25131	15.64326	15.25131
379822	3735045	16.34607	15.94584	22.01063	21.46622	22.01063	21.46622	21.63591	21.10104	21.63591	21.10104	21.8759	21.33728	16.34607	15.94584	22.01063	21.46622	22.01063	21.46622
383537	3739930	10.31544	9.914851	13.91925	13.38078	13.91925	13.38078	13.66253	13.13408	13.66253	13.13408	13.80008	13.26554	10.31544	9.914851	13.91925	13.38078	13.91925	13.38078
387465	3742345	6.38071	6.066413	8.657635	8.235749	8.657635	8.235749	8.48336	8.069908	8.48336	8.069908	8.548467	8.130115	6.38071	6.066413	8.657635	8.235749	8.657635	8.235749
389765	3740701	5.845086	5.680592	7.951382	7.728779	7.951382	7.728779	7.779314	7.562403	7.779314	7.562403	7.829446	7.610841	5.845086	5.680592	7.951382	7.728779	7.951382	7.728779
390098	3740230	5.956377	5.700791	8.10405	7.758633	8.10405	7.758633	7.925973	7.591075	7.925973	7.591075	7.976174	7.638709	5.956377	5.700791	8.10405	7.758633	8.10405	7.758633
382957	3740576	10.36016	9.899271	13.97722	13.35683	13.97722	13.35683	13.72329	13.11536	13.72329	13.11536	13.86293	13.24846	10.36016	9.899271	13.97722	13.35683	13.97722	13.35683
390623	3740004	5.809661	5.616854	7.907857	7.647717	7.907857	7.647717	7.733585	7.48111	7.733585	7.48111	7.781188	7.526585	5.809661	5.616854	7.907857	7.647717	7.907857	7.647717
380096	3734974	18.08606	17.52751	24.32915	23.57518	24.32915	23.57518	23.9116	23.17069	23.9116	23.17069	24.18569	23.43722	18.08606	17.52751	24.32915	23.57518	24.32915	23.57518
389847	3741751	5.808903	5.63051	7.899403	7.658529	7.899403	7.658529	7.729919	7.494938	7.729919	7.494938	7.78101	7.543935	5.808903	5.63051	7.899403	7.658529	7.899403	7.658529
380473	3734491	19.86698	19.24517	26.70516	25.86681	26.70516	25.86681	26.24335	25.4198	26.24335	25.4198	26.55107	25.71886	19.86698	19.24517	26.70516	25.86681	26.70516	25.86681
389894	3738960	6.363134	6.123969	8.657708	8.332789	8.657708	8.332789	8.447267	8.139805	8.447267	8.139805	8.51692	8.199948	6.363134	6.123969	8.657708	8.332789	8.657708	8.332789
383041	3739433	11.64898	11.13405	15.69074	15.00859	15.69074	15.00859	15.40436	14.73523	15.40436	14.73523	15.56671	14.88973	11.64989	11.13405	15.69314	15.00884	15.69191	15.00884
379899	3739740	12.47173	12.12431	16.79843	16.33045	16.79843	16.33045	16.50936	16.04941	16.50936	16.04941	16.69033	16.22521	12.47173	12.12431	16.79843	16.33045	16.79843	16.33045
389193	3738664	6.625201	6.410442	9.009735	8.709358	9.009735	8.709358	8.808224	8.515732	8.808224	8.515732	8.865064	8.571076	6.625201	6.410442	9.009735	8.709358	9.009735	8.709358
384704	3739154	9.376913	9.029419	12.67216	12.20467	12.67216	12.20467	12.42857	11.96993	12.42857	11.96993	12.54488	12.08114	9.376913	9.029419	12.67216	12.20467	12.67216	12.20467
381437	3734112	29.01696	27.91753	38.88064	37.39415	38.88064	37.39415	38.20215	36.74169	38.20215	36.74169	38.69642	37.2172	29.01696	27.91753	38.88064	37.39415	38.88064	37.39415
390296	3737362	6.6214	6.262321	9.012497	8.52425	9.012497	8.52425	8.805242	8.333485	8.805242	8.333485	8.858206	8.384228	6.6214	6.262321	9.012497	8.52425	9.012497	8.52425
389492	3740248	6.022305	5.812121	8.189932	7.906308	8.189932	7.906308	8.01215	7.735241	8.01215	7.735241	8.064655	7.785182	6.022305	5.812121	8.189932	7.906308	8.189932	7.906308
389517	3739600	6.135014	5.943288	8.34441	8.084228	8.34441	8.084228	8.161755	7.907478	8.161755	7.907478	8.214554	7.958438	6.135014	5.943288	8.34441	8.084228	8.34441	8.084228
389536	3740757	5.880199	5.719719	7.99698	7.780062	7.99698	7.780062	7.824595	7.613787	7.824595	7.613787	7.875955	7.663475	5.880199	5.719719	7.99698	7.780062	7.99698	7.780062
390248	3737686	6.570683	6.214327	8.943526	8.458102	8.943526	8.458102	8.738217	8.268547	8.738217	8.268547	8.790827	8.319182	6.570683	6.214327	8.943526	8.458102	8.943526	8.458102
389459	3737689	6.802545	6.516982	9.25383	8.866384	9.25383	8.866384	9.042448	8.666665	9.042448	8.666665	9.09902	8.720946	6.802545	6.516982	9.25383	8.866384	9.25383	8.866384
382217	3738795	13.94308	13.05435	18.76008	17.57054	18.76008	17.57054	18.42631	17.25641	18.42631	17.25641	18.63424	17.44852	13.94308	13.05435	18.76008	17.57054	18.76008	17.57054
380194	3736308	18.38949	17.65859	24.70542	23.72361	24.70542	23.72361	24.28148	23.31522	24.28148	23.31522	24.57187	23.59378	18.38949	17.65859	24.70542	23.72361	24.70542	23.72361
388854	3740055	6.224711	6.015869	8.461298	8.179245	8.461298	8.179245	8.277326	8.004285	8.277326	8.004285	8.332983	8.057872	6.224711	6.015869	8.461298	8.179245	8.461298	8.179245
386767	3739844	7.400704	7.019304	10.03209	9.519224	10.03209	9.519224	9.826735	9.323267	9.826735	9.323267	9.905219	9.395998	7.400704	7.019304	10.03209	9.519224	10.03209	9.519224
388039	3738643	6.841914	6.53158	9.293852	8.874504	9.293852	8.874504	9.090794	8.682865	9.090794	8.682865	9.154195	8.742925	6.841914	6.53158	9.293852	8.874504	9.293852	8.874504
380825	3733609	20.63874	19.98432	27.74023	26.79809	27.74023	26.79809	27.25847	26.33246	27.25847	26.33246	27.57871	26.64147	20.63874	19.98432	27.74023	26.79809	27.74023	26.79809
381497	3733030	24.27099	22.95892	32.57626	30.82058	32.57626	30.82058	32	30.27555	32	30.27555	32.39188	30.64435	24.27099	22.95892	32.57626	30.82058	32.57626	30.82058
387362	3740183	7.022386	6.596375	9.525623	8.952669	9.525623	8.952669	9.327838	8.767413	9.327838	8.767413	9.399511	8.833024	7.022386	6.596375	9.525623	8.952669	9.525623	8.952669
388668	3737492	6.993432	6.791069	9.507551	9.232191	9.507551	9.232191	9.291862	9.024015	9.291862	9.024015	9.352471	9.083156	6.993432	6.791069	9.507551	9.232191	9.507551	9.232191
380507	3736370	19.90287	19.3593	26.73317	25.99626	26.73317	25.99626	26.27145	25.54622	26.27145	25.54622	26.58725	25.85574	19.90287	19.3593	26.73317	25.99626	26.73317	25.99626
380478	3736076	20.31229	19.87187	27.27835	26.68039	27.27835	26.68039	26.80689	26.2183	26.80689	26.2183	27.13093	26.53755	20.31229	19.87187	27.27835	26.68039	27.27835	26.68039
387306	3739448	7.051789	6.780773	9.569292	9.202317	9.569292	9.202317	9.367821	9.009085	9.367821	9.009085	9.437953	9.076311	7.051789	6.780773	9.569292	9.202317	9.569292	9.202317
386955	3740430	7.123302	6.849466	9.658796	9.2901	9.658796	9.2901	9.461482	9.100465	9.461482	9.100465	9.536071	9.171258	7.123302	6.849466	9.658796	9.2901	9.658796	9.2901
386883	3740498	7.127237	6.844282	9.663738	9.283304	9.663738	9.283304	9.466858	9.093785	9.466858	9.093785	9.541725	9.164428	7.127237	6.844282	9.663738	9.283304	9.663738	9.283304
387067	3741097	6.820925	6.589235	9.251603	8.939798	9.251603	8.939798	9.063608	8.758381	9.063608	8.758381	9.134158	8.825676	6.820925	6.589235	9.251603	8.939798	9.251603	8.939798
381098	3735252	25.70518	24.86986	34.46741	33.3467	34.46741	33.3467	33.868	32.76617	33.868	32.76617	34.2971	33.18153	25.70518	24.86986	34.46741	33.3467	34.46741	33.3467
381167	3735184	25.40792	24.8048	34.06001	33.25103	34.06001	33.25103	33.46844	32.67382	33.46844	32.67382	33.89601	33.09145	25.40792	24.8048	34.06001	33.25103	34.06001	33.25103
387129	3740300	7.098578	6.738653	9.626377	9.142469	9.626377	9.142469	9.429143	8.954304	9.429143	8.954304	9.502976	9.022719	7.098578	6.738653	9.626377	9.142469	9.626377	9.142469
381405	3733242	24.06263	23.2617	32.29963	31.22589	32.29963	31.22589	31.72772	30.6748	31.72772	30.6748	32.11505	31.049	24.06263	23.2617	32.29963	31.22589	32.29963	31.22589
381411	3733508	25.90507	24.69213	34.74909	33.12629	34.74909	33.12629	34.13732	32.54269	34.13732	32.54269	34.56355	32.9473	25.90507	24.69213	34.74909	33.12629	34.74909	33.12629
381414	3733803	26.98968	26.02505	36.18741	34.89446	36.18741	34.89446	35.55205	34.28075	35.55205	34.28075	36.00258	34.71487	26.98968	26.02505	36.18741	34.89446	36.18741	34.89446
387721	3742199	6.280084	6.064819	8.524773	8.234056	8.524773	8.234056	8.350949	8.067759	8.350949	8.067759	8.413315	8.127693	6.280084	6.064819	8.524773	8.234056	8.524773	8.234056
383262	3736996	14.11084	13.46233	18.99445	18.12482	18.99445	18.12482	18.64192	17.78802	18.64192	17.78802	18.84671	17.98226	14.11084	13.46233	18.99445	18.12482	18.99445	18.12482
382659	3737519	15.49322	14.74999	20.83131	19.83603	20.83131	19.83603	20.45563	19.47733	20.45563	19.47733	20.69108	19.69994	15.49322	14.74999	20.83131	19.83603	20.83131	19.83603
382237	3737492	17.08409	16.25311	22.94684	21.8384	22.94684	21.8384	22.54412	21.44935	22.54412	21.44935	22.81167	21.70255	17.08409	16.25311	22.95173	21.8384	22.95173	21.8384
381821	3737471	17.74765	17.00098	23.83585	22.83463	23.83585	22.83463	23.41545	22.43118	23.41545	22.43118	23.69657	22.69978	17.74765	17.00098	23.83585	22.83463	23.83585	22.83463
382575	3735031	15.98624	14.89981	21.53848	20.06276	21.53848	20.06276	21.21868	19.72204	21.21868	19.72204	21.45268	19.89964	16.00324	14.90178	21.62568	20.06627	21.62568	20.06522
382628.5	3735071	15.88493	14.67235	21.46241	19.76022	21.46241	19.76022	21.05644	19.76129	21.05644	19.38479	21.28737	19.59271	15.94563	14.67257	21.46241	19.76054	21.46241	19.76054
382704.9	3735128	15.46679	14.48857	21.0381	19.51465	21.0381	19.51465	20.6386	19.14184	20.6386	19.14184	20.86327	19.34613	15.62749	14.48857	21.0381	19.51465	21.0381	19.51465
382767.5	3735065	14.56937	13.6955	19.62984	18.62503	19.62984	18.59563	19.25265	18.34556	19.25265	18.34556	19.45532	18.53681	14.56937	13.86665	19.62984	18.7068	19.62984	18.7068
382828.6	3735107	14.45373	13.50802	19.4752	18.35968	19.4752	18.35938	19.10058	18.01037	19.10058	18.01037	19.30112	18.1967	14.45373	13.62578	19.4752	18.36619	19.4752	18.36619
382858.8	3735097	14.21637	13.37812	19.15957	18.09037	19.15957	18.09018	18.78965	17.79471	18.78965	17.79471	18.98529	17.97763	14.21637	13.42322	19.15957	18.1032	19.15957	18.0967
382915.1	3735162	14.20304	13.241	19.14071	17.85234	19.14071	17.85234	18.77149	17.50564	18.77149	17.50564	18.96717	17.68454	14.20304	13.241	19.14071	17.85271	19.14071	17.85271
383713	3735584	11.95418	11.20357	16.13749	15.13005	16.13749	15.13005	15.81529	14.82668	15.81529	14.82668	15.96809	14.96759	11.95418	11.20357	16.13749	15.13005	16.13749	15.13005
383722.9	3735566	11.88497	11.20078	16.04562	15.1047	16.04562	15.1047	15.72454	14.82301	15.72454	14.82301	15.87581	14.96378	11.88497	11.20078	16.04562	15.12651	16.04562	15.12651
383697.5	3735551	11.94171	11.25116	16.1212	15.19379	16.1212	15.19379	15.79926	14.88905	15.79926	14.88905	15.95173	15.03079	11.94171	11.25116	16.1212	15.19379	16.1212	15.19379
383513.6	3735351	12.07923	11.55504	16.30656	15.70118	16.30656	15.70118	15.98162	15.39078	15.98162	15.39078	16.13615	15.53782	12.07923	11.63191	16.30656	15.70227	16.30656	15.70227
382977.5	3735085	13.49752	12.84614	18.20398	17.32713	18.20398	17.32713	17.84925	17.19655	17.84925	17.19655	18.02808	17.34475	13.49837	12.84759	18.20398	17.51533	18.20398	17.44483
383145.9	3734712	12.95531	12.53582	17.48112	16.91276	17.48112	16.91276	17.13158	16.58736	17.13158	16.58736	17.30011	16.7387	12.95531	12.53582	17.48112	16.91276	17.48112	16.91276
383112.8	3734692	13.08081	12.7162	17.64871	17.15515	17.64871	17.15515	17.29726	16.82945	17.29726	16.82945	17.46825	16.98059	13.08081	12.7162	17.64871	17.15515	17.64871	17.15515
383065.6	3734773	13.2293	12.77946	17.84866	17.24207	17.84866	17.24207	17.49424	16.89864	17.49424	16.89864	17.66753	17.06575	13.2293	12.77946	17.84866	17.24207	17.84866	17.24207
382925.9	3734712	14.05718	13.36328	18.95295	18.00919	18.95295	18.00919	18.58011	17.66703	18.58011	17.66703	18.76952	17.83094	14.05718	13.36328	18.95295	18.00919	18.95295	18.00919
382903.6	3734755	14.10164	13.36323	19.01155	18.02094	19.01155	18.02094	18.63863	17.69032	18.63863	17.69032	18.82925	17.84398	14.10164	13.37027	19.01155	18.02094	19.01155	18.02094
382664.8	3734643	15.3376	14.64339	20.65734	19.72718	20.65734	19.72718	20.26059	19.34711	20.26059	19.34711	20.47687	19.55163	15.3376	14.64339	20.65734	19.72718	20.65734	19.72718
382810.4	3734273	15.06564	14.22538	20.29618	19.15821	20.29618	19.15821	19.90073	18.79113	19.90073	18.79564	20.1103	18.97756	15.06564	14.22538	20.29618	19.15821	20.29618	19.15821
382837.4	3734182	15.07858	14.25614	20.31541	19.14818	20.31541	19.14818	19.91767	18.79046	19.91767	18.83551	20.12648	18.98141	15.07858	14.25614	20.31541	19.16496	20.31541	19.16496

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
382763.3	3734087	15.65034	14.66631	21.07461	19.63067	21.07461	19.61472	20.66753	19.37239	20.66753	19.37334	20.88353	19.50479	15.65034	14.66631	21.07461	19.66641	21.07461	19.66641
382485.1	3733963	17.90657	16.97142	24.08409	22.83848	24.08409	22.83848	23.62902	22.40439	23.62902	22.40439	23.89503	22.65445	17.90657	16.9771	24.08409	22.83848	24.08409	22.83848
382173.4	3733819	21.48012	20.56316	28.84326	27.7388	28.84326	27.7388	28.31615	27.23128	28.31615	27.10543	28.65549	27.55766	21.48012	20.56316	28.84326	27.7388	28.84326	27.7388
382203.6	3733740	21.34801	20.43118	28.66869	27.44517	28.66869	27.44517	28.1431	26.94105	28.1431	26.93288	28.47901	27.26238	21.34801	20.43118	28.66869	27.44517	28.66869	27.44517
382087.1	3733719	23.09493	22.20799	30.99475	29.80361	30.99475	29.80361	30.43289	29.26212	30.43289	29.26212	30.80468	29.61973	23.09493	22.20799	30.99475	29.80361	30.99475	29.80361
382088.9	3733645	23.42418	22.2845	31.43441	29.90637	31.43441	29.90637	30.86456	29.36232	30.86456	29.36232	31.24251	29.72107	23.42418	22.2845	31.43441	29.90637	31.43441	29.90637
382015.6	3733643	24.81242	23.72445	33.28273	31.82369	33.28273	31.82369	32.68437	31.24972	32.68437	31.24972	33.09095	31.63798	24.81242	23.72445	33.28273	31.82369	33.28273	31.82369
382015.2	3733608	24.95851	23.80367	33.47765	31.92956	33.47765	31.92956	32.87621	31.35374	32.87621	31.35374	33.28559	31.74348	24.95851	23.80367	33.47765	31.92956	33.47765	31.92956
382530.1	3735089	17.34128	15.49277	23.31858	20.998	23.31858	20.91491	22.88559	20.63487	22.88559	20.63487	23.14632	20.86311	17.34128	15.57906	23.31858	21.0292	23.31858	21.0292
382552.6	3735060	16.52771	15.02519	22.4716	20.23145	22.4716	20.2294	22.05152	20.19398	22.05152	19.96048	22.2986	20.31411	16.70421	15.02801	22.4716	20.25528	22.4716	20.23358
382601.8	3735051	15.94412	14.78918	21.5587	19.91663	21.5587	19.91576	21.15188	19.65964	21.15188	19.53954	21.38451	19.74998	16.01822	14.79037	21.5587	19.91732	21.5587	19.91732
382666.7	3735100	15.70923	14.62331	21.27745	19.69477	21.27745	19.69477	20.87395	19.43541	20.87395	19.31931	21.10197	19.5262	15.80673	14.62331	21.27745	19.69477	21.27745	19.69477
382736.2	3735096	14.98469	14.11154	20.18283	19.01349	20.18283	19.01349	19.79676	18.64797	19.79676	18.64797	20.00805	18.84415	14.98469	14.11154	20.18283	19.01349	20.18283	19.01349
382798	3735086	14.52701	13.60118	19.57324	18.49865	19.57324	18.49865	19.19685	18.14288	19.19685	18.14288	19.39879	18.33109	14.52701	13.72638	19.57324	18.50062	19.57324	18.50062
382887	3735129	14.23294	13.35807	19.18126	18.03537	19.18126	18.03537	18.81091	17.68516	18.81091	17.68516	19.00691	17.86656	14.23294	13.37773	19.18126	18.03557	19.18126	18.03557
382957.1	3735184	14.0303	13.04006	18.91047	17.59184	18.91047	17.58304	18.54518	17.25109	18.54518	17.25109	18.73754	17.42637	14.0303	13.04661	18.91047	17.59333	18.91047	17.59333
382999.1	3735206	13.89475	12.86163	18.7301	17.35783	18.7301	17.34503	18.36649	17.02661	18.36649	17.02661	18.55583	17.19855	13.89475	12.87569	18.7301	17.36539	18.7301	17.36539
383041.1	3735228	13.80041	12.69241	18.60432	17.14575	18.60432	17.07695	18.24197	16.81236	18.24197	16.81236	18.42939	16.98129	13.80041	12.71218	18.60432	17.14699	18.60432	17.14699
383083.1	3735251	13.73579	12.57019	18.5176	16.95675	18.5176	16.95675	18.15652	16.62531	18.15652	16.62531	18.34278	16.79148	13.73579	12.57019	18.5176	16.95711	18.5176	16.95711
383125.1	3735273	13.63802	12.41849	18.38639	16.75288	18.38639	16.75288	18.0279	16.42539	18.0279	16.42539	18.21257	16.58879	13.63802	12.41849	18.38639	16.75427	18.38639	16.75427
383167	3735295	13.50879	12.28856	18.21305	16.57697	18.21305	16.57807	17.85833	16.25339	17.85833	16.25339	18.04107	16.4143	13.50879	12.28856	18.21305	16.58041	18.21305	16.58041
383209	3735317	13.37564	12.14308	18.0345	16.3849	18.0345	16.3849	17.68318	16.0897	17.68318	16.0615	17.86373	16.24853	13.37564	12.16462	18.0345	16.4141	18.0345	16.4141
383251	3735339	13.24995	11.96984	17.86617	16.15326	17.86617	16.15326	17.51749	15.96975	17.51749	15.96975	17.69581	16.1272	13.24995	12.07355	17.86617	16.2917	17.86617	16.2917
383293	3735362	13.1146	11.79969	17.6852	16.10999	17.6852	16.07449	17.33968	15.9122	17.33968	15.9122	17.51555	16.06922	13.1146	12.02993	17.6852	16.23259	17.6852	16.23259
383335	3735384	12.98209	11.76387	17.50826	16.0802	17.50826	16.0595	17.16606	15.76202	17.16606	15.76202	17.33947	15.91671	12.98209	11.9158	17.50826	16.08042	17.50826	16.08042
383377	3735406	12.86077	11.70846	17.34639	15.84747	17.34639	15.84747	17.00672	15.53331	17.00672	15.53331	17.17781	15.68474	12.86077	11.7412	17.34639	15.8475	17.34639	15.8475
383419	3735428	12.7308	11.648	17.17288	15.73988	17.17288	15.73988	16.83632	15.42731	16.83632	15.42731	17.0049	15.57712	12.7308	11.66055	17.17288	15.73994	17.17288	15.73994
383461	3735451	12.6193	11.59664	17.02422	15.65438	17.02422	15.65438	16.68957	15.34345	16.68957	15.34345	16.85593	15.49216	12.6193	11.59664	17.02422	15.65451	17.02422	15.65451
383503	3735473	12.51608	11.5342	16.88671	15.57096	16.88671	15.57075	16.55352	15.26147	16.55352	15.26147	16.71773	15.4089	12.51608	11.5342	16.88671	15.57108	16.88671	15.57108
383545	3735495	12.40369	11.46103	16.73683	15.47263	16.73683	15.47263	16.40579	15.16559	16.40579	15.16559	16.56765	15.31169	12.40369	11.46103	16.73683	15.47343	16.73683	15.47343
383587	3735517	12.28216	11.40956	16.57476	15.39393	16.57476	15.39726	16.24638	15.09748	16.24638	15.09748	16.40588	15.24249	12.28216	11.40956	16.57476	15.40482	16.57476	15.40482
383629	3735539	12.15155	11.35276	16.40045	15.32918	16.40045	15.32918	16.07525	15.0225	16.07525	15.0225	16.23239	15.16631	12.15155	11.35276	16.40045	15.32918	16.40045	15.32918
383671	3735562	12.05333	11.28401	16.26963	15.2375	16.26963	15.2375	15.94581	14.93212	15.94581	14.93212	16.1008	15.07457	12.05333	11.28401	16.26963	15.2375	16.26963	15.2375
383666.9	3735518	11.96843	11.25391	16.15708	15.18065	16.15708	15.18065	15.83492	14.8927	15.83492	14.8927	15.98792	15.03425	11.96843	11.25391	16.15708	15.19783	16.15708	15.19783
383636.2	3735484	11.9932	11.23416	16.19036	15.17034	16.19036	15.17034	15.86796	14.87953	15.86796	14.87953	16.02132	15.02079	11.9932	11.24366	16.19036	15.18445	16.19036	15.18445
383605.5	3735451	12.03385	11.24585	16.24501	15.38253	16.24501	15.38253	15.92115	15.08734	15.92115	15.08734	16.07511	15.23184	12.03385	11.40202	16.24501	15.39549	16.24501	15.39549
383574.9	3735417	12.06172	11.29187	16.28259	15.3568	16.28259	15.3279	15.95779	15.27239	15.95779	15.27239	16.11219	15.41975	12.06172	11.54289	16.28259	15.57523	16.28259	15.57523
383544.2	3735384	12.07678	11.35811	16.30296	15.36493	16.30296	15.33563	15.97794	15.35072	15.97794	15.35072	16.13238	15.49434	12.07678	11.59923	16.30296	15.65809	16.30296	15.65809
383468.9	3735329	12.17005	11.53947	16.42755	15.74473	16.42755	15.71873	16.10144	15.46842	16.10144	15.46842	16.25798	15.61766	12.17005	11.69184	16.42755	15.7826	16.42755	15.7826
383424.2	3735306	12.28502	11.56675	16.58094	15.80482	16.58094	15.77342	16.25236	15.52649	16.25236	15.52649	16.41107	15.67396	12.28502	11.73397	16.58094	15.83884	16.58094	15.83884
383379.6	3735284	12.40445	11.70103	16.74034	15.79713	16.74034	15.79543	16.40908	15.58679	16.40908	15.58679	16.56996	15.73495	12.40445	11.77972	16.74034	15.90048	16.74034	15.90048
383334.9	3735262	12.53227	11.82885	16.91128	15.96581	16.91128	15.96581	16.5769	15.66034	16.5769	15.66034	16.74017	15.81258	12.53227	11.83746	16.91128	15.978	16.91128	15.978
383290.2	3735240	12.66168	11.8935	17.08462	16.052	17.08462	16.052	16.74705	15.74344	16.74705	15.74344	16.91251	15.89285	12.66168	11.89775	17.08462	16.05911	17.08462	16.05911
383245.6	3735218	12.77601	12.06617	17.23788	16.28187	17.23788	16.28187	16.89781	15.96945	16.89781	15.96945	17.06521	16.11641	12.77601	12.06617	17.23788	16.28428	17.23788	16.28428
383200.9	3735196	12.89535	12.26795	17.39845	16.55248	17.39845	16.55248	17.05533	16.24184	17.05533	16.24184	17.22444	16.39126	12.89535	12.27149	17.39845	16.55413	17.39845	16.55413
383156.2	3735174	13.04291	12.40262	17.59685	16.73439	17.59685	16.73439	17.24954	16.42551	17.24954	16.42551	17.42049	16.58699	13.04291	12.41783	17.59735	16.75736	17.59735	16.75623
383111.5	3735152	13.26079	12.50086	17.88882	16.86562	17.88882	16.86562	17.53764	16.5554	17.53764	16.5554	17.71244	16.71859	13.26207	12.51562	17.88882	16.88858	17.88882	16.88708
383066.9	3735130	13.40226	12.67719	18.07791	17.03018	18.07791	17.03018	17.72455	16.78765	17.72455	16.78765	17.89944	16.8811	13.40398	12.69195	18.07791	17.03286	18.07791	17.03018
383022.2	3735107	13.46258	12.81696	18.15794	17.2884	18.15794	17.2884	17.80402	16.99066	17.80402	16.99066	17.98086	17.12676	13.46403	12.83243	18.15794	17.2884	18.15794	17.2884
382996.2	3735044	13.42054	12.62298	18.10253	17.03142	18.10253	17.03142	17.74728	16.93876	17.74728	16.93876	17.92523	17.1079	13.42054	12.6691	18.10253	17.24982	18.10253	17.18952
383014.9	3735002	13.28703	12.63071	17.92574	17.04297	17.92574	17.04297	17.57246	16.93955	17.57552	16.9408	17.74717	17.10803	13.28703	12.74967	17.92574	17.12807	17.92574	17.04997
383033.7	3734961	13.25734	12.63736	17.88688	17.05278	17.88688	17.05278	17.53347	16.8123	17.53347	16.8123	17.70724	16.87923	13.25734	12.63736	17.88688	17.05278	17.88688	17.05278
383052.4	3734919	13.20279	12.63407	17.81442	17.04875	17.81442	17.04875	17.46173	16.73024	17.46173	16.73024	17.63422	16.8747	13.20279	12.64927	17.81442	17.04875	17.81442	17.04875
383071.1	3734878	13.14215	12.61424	17.73333	17.02202	17.73333	17.02202	17.38147	16.68406	17.38147	16.68406	17.55285	16.84808	13.14215	12.61424	17.73333	17.02202	17.73333	17.02202
383089.8	3734836	13.10538	12.58461	17.68349	16.98159	17.68349	16.97246	17.33203	16.64408	17.33203	16.64408	17.50288	16.80782	13.10538	12.58461	17.68349	16.98159	17.68349	16.98159
383108.5	3734795	13.05489	12.54148	17.61507	16.91573	17.61507	16.91573	17.26429	16.60184	17.26429	16.60184	17.43452	16.7655	13.05489	12.55386	17.61507	16.93904	17.61507	16.93904
383127.2	3734754	13.00278	12.54121	17.54474	16.92123	17.54474	16.92123	17.19475	16.58464	17.19475	16.58619	17.36415	16.74766	13.00278	12.54121	17.54474	16.92123	17.54474	16.92123
383089.2	3734733	13.14604	12.74707	17.73644	17.1974	17.73644	17.1974	17.3842	16.87279	17.3842	16.85685	17.55629	17.02215	13.14604	12.74707	17.73644	17.1974	17.73644	17.1974
383030.6	3734758	13.45388	12.92322	18.14915	17.43483	18.14915	17.43483	17.78909	17.10608	17.78909	17.08835	17.96631	17.25793	13.45388	12.92322	18.14915	17.43483	18.14915	17.43483
382995.7	3734743	13.67549	13.18764	18.44491	17.78796	18.44491	17.78796	18.08004	17.45114	18.08004	17.45252	18.26147	17.60938	13.67549	13.18764	18.44491	17.78796	18.44491	17.78796
382960.8	3734727	13.88667	13.27627	18.712	17.89526	18.712	17.89526	18.35665	17.56614	18.35665	17.56614	18.5284	17.73118	13.88667	13.27627	18.712	17.89526	18.712	17.89526
382863.8	3734736	14.30637	13.60055	19.28374	18.32054	19.28374	18.32054	18.90681	17.99063	18.90681	17.99063	19.10185	18.14817	14.30637	13.60055	19.28374	18.32054	19.28374	18.32054
382824	3734718	14.52743	13.74102	19.57831	18.52395	19.57831	18.45885	19.19654	18.17387	19.19654	18.17387	19.39604	18.36003	14.52743	13.74102	19.57831	18.52395	19.57831	18.52395
382784.2	3734699	14.74613	13.98814	19.86979	18.85332	19.86979	18.85332	19.48367	18.49686	19.48367	18.49686	19.6876	18.68799	14.74613	13.99546	19.86979	18.86419	19.86979	18.86419
382744.4	3734681	14.94909	14.10556	20.14013	19.01031	20.14013	19.00203	19.75053	18.64159	19.75053	18.64159	19.95864	18.83489	14.94909	14.10556	20.14013	19.01115	20.14013	19.01115
382704.6	3734662	15.12684	14.43866	20.37664	19.45491	20.37664	19.45491	19.98466	19.07821	19.98466	19.07821	20.19672	19.27817	15.12684	14.43866	20.37664	19.45491	20.37664	19.45491
382683	3734597	15.35393	14.65157	20.67994	19.73898	20.67994	19.73898	20.28184	19.35798	20.28184	19.35798	20.49801	19.56223	15.35393	14.65157	20.67994	19.73898	20.67994	19.73898
382701.2	3734551	15.31584	14.58488	20.6289	19.64987	20.6289	19.64987	20.23123	19.26978	20.23123	19.26978	20.44669	19.47267	15.31584	14.58488	20.6289	19.64987	20.6289	19.64987
382719.4	3734504	15.27121	14.49199	20.56905	19.52575	20.56905	19.52575	20.17204	19.14706	20.17204	19.14706	20.38666	19.34809	15.27121	14.49199	20.56905	19.52575	20.56905	19.52575
382737.6	3734458	15.22832	14.39895	20.51168	19.391	20.51168	19.391	20.11521	19.02455	20.11521	19.02455	20.32892	19.21522	15.22832	14.39895	20.51168	19.39303	20.51168	19.39303
382755.8	3734412	15.20002	14.34313	20.47427	19.32098	20.47427	19.28268	20.07767	18.95344	20.07767	18.95344	20.29056	19.14232	15.20002	14.34477	20.47427	19.32098	20.47427	19.32098
382774	3734365	15.1503	14.34876	20.40816	19.33234	20.40816	19.28634	20.01218	18.95514	20.01218	18.95803	20.22401	19.153	15.1503	14.34876	20.40816	19.33234	20.40816	19.33234
382792.2	3734319	15.10663	14.31668	20.35042	19.27428	20.35042	19.27428	19.9547	18.91323	19.9547	18.91564	20.16538	19.11027	15.10663	14.31668	20.35042	19.29039	20.35042	19.28068
382823.9	3734227	15.07524	14.24266	20.31002	19.11751	20.31002	19.11751	19.91324	18.74153	19.91324	18.81813	20.12256	18.93525	15.07524	14.24266	20.31002	19.11751	20.31002	19.11751
382812.7	3734150	15.25854	14.34166	20.55343	19.24834	20.55343	19.23299	20.1538	18.94746	20.1538	18.94746	20.36406	19.10786	15.25854	14.34166	20.55343	19.29104	20.55343	19.27985
382788	3734119	15.45919	14.52535	20.82027	19.4355	20.82027	19.41995	20.41671	19.16209	20.41671	19.18853	20.62985	19.30488	15.45919	14.52535	20.82027	19.47422	20.82027	19.47422
382723.6	3734069	15.9173	15.0243	21.39919	20.07449	21.39649	20.06898	21.01559	19.81608	21.01791	19.8423	21.23809	19.95829	15.9173	15.0243	21.42996	20.11093	21.42996	20.09522
382683.8	3734052	16.18326	15.36729	21.78395	20.56648	21.78395	20.55044	21.36689	20.28996	21.36689	20.29262	21.59133	20.42899	16.18326	15.36729	21.78395	20.60825	21.78395	20.60825
382644.1	3734034	16.53895	15.73784	22.25717	21.13331	22.25717	21.11694	21.8337	20.77438	21.8337	20.77852	22.0689	20.97637	16.53895	15.73784	22.26141	21.16213	22.26141	21.16213
382604.3	3734016	16.88558	16.08618	22.72494	21.64571	22.72494	21.64571	22.28887	21.22843	22.28887	21.23573	22.53332	21.45983	16.88558	16.08618	22.72494	21.64571	22.72494	21.64571
382564.6	3733999	17.24289	16.37071	23.20088	22.03216	23.20088	22.03216	22.75797	21.60883	22.75797	21.60883	23.00987	21.84581	17.24289	16.37071	23.20088	22.03216	23.20088	22.03216
382524.8	3733981	17.57095	16.72801	23.63741	22.50752	23.63741	22.50752	23.18874	22.07734	23.18874	22.07734	23.44773	22.32186	17.57095	16.72801	23.63741	22.50752	23.63741	22.50752
382440.6	3733943	18.29436	17.36991	24.6005	23.3707	24.6005	23.3707	24.13765	22.92844	24.13765	22.92844	24.41163	23.18693	18.29436	17.36991	24.6005	23.3707	24.6005	23.3707
382396	3733922	18.72061	17.97182	25.16829	24.16272	25.16829	24.16272	24.69693	23.70821	24.69693	23.70821	24.97963	23.97877	18.72061	17.97182	25.16829	24.16272	25.16829	24.16272
382351.5	3733901	19.17211	18.65338	25.76922	25.06973	25.76922	25.06973	25.2892	24.60141	25.2892	24.60141	25.58136	24.88628	19.17211	18.65338	25.76922	25.06973	25.76922	25.06973
382307	3733881	19.70673	19.32561	26.48132	25.96509	26.48132	25.96509	25.99047	25.48243	25.99047	25.48243	26.29361	25.78093	19.70673	19.32561	26.48132	25.96509	26.48132	25.96509
382262.4	3733860	20.24998	19.72874	27.20471	26.50175	27.20471	26.50175	26.70324	26.01214	26.70324	26.01214	27.01756	26.31927	20.24998	19.72874	27.20471	26.50175	27.20471	26.50175

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
382217.9	3733840	20.86257	20.15193	28.02058	27.06513	28.02058	27.06513	27.50673	26.56758	27.50673	26.56758	27.83352	26.88341	20.86257	20.15193	28.02058	27.06513	28.02058	27.06513
382188.5	3733780	21.42069	20.5419	28.76483	27.59619	28.76483	27.59619	28.23838	27.09034	28.23838	27.07977	28.57615	27.41425	21.42069	20.5419	28.76483	27.59619	28.76483	27.59619
382165.1	3733729	21.80766	21.1287	29.28015	28.3657	29.28015	28.3657	28.7451	27.84689	28.7451	27.84689	29.09068	28.18268	21.80766	21.1287	29.28015	28.3657	29.28015	28.3657
382125.9	3733726	22.33775	21.60871	29.98647	29.00554	29.98647	29.00554	29.44047	28.47646	29.44047	28.47646	29.79681	28.82179	22.33775	21.60871	29.98647	29.00554	29.98647	29.00554
382088	3733682	23.25857	22.25085	31.21321	29.86107	31.21321	29.86107	30.64739	29.31808	30.64739	29.31808	31.02222	29.67638	23.25857	22.25085	31.21321	29.86107	31.21321	29.86107
382052.3	3733644	24.09343	23.0039	32.32551	30.86414	32.32551	30.86414	31.74178	30.30522	31.74178	30.30522	32.13359	30.67873	24.09343	23.0039	32.32551	30.86414	32.32551	30.86414
381977.3	3733607	25.59534	24.54197	34.32584	32.91265	34.32584	32.91265	33.71168	32.32193	33.71168	32.32193	34.13417	32.72686	25.59534	24.54197	34.32584	32.91265	34.32584	32.91265
382569.5	3735119	17.3526	15.62094	23.33386	21.02117	23.33386	21.02117	22.89927	20.84496	22.89927	20.62676	23.15999	20.85511	17.3526	15.62094	23.33386	21.02117	23.33386	21.02117
382609	3735150	17.29095	15.40302	23.25172	20.73067	23.25172	20.73067	22.81769	20.90102	22.81769	20.34052	23.07698	20.5644	17.29095	15.40302	23.25172	20.73067	23.25172	20.73067
382648.5	3735181	17.14088	15.43789	23.05092	20.7762	23.05092	20.7762	22.62005	20.5383	22.62005	20.38474	22.87661	20.60961	17.14088	15.43789	23.05092	20.7762	23.05092	20.7762
382515.2	3735111	17.77219	15.96758	23.89104	21.48201	23.89104	21.48201	23.44943	21.49722	23.44943	21.08082	23.71948	21.31654	17.77219	15.96758	23.89104	21.48201	23.89104	21.48201
382740.6	3735163	15.51619	14.32617	20.88852	19.29726	20.88852	19.29726	20.49242	18.92796	20.49242	18.92796	20.7154	19.12943	15.51619	14.32617	20.88852	19.29726	20.88852	19.29726
382744.4	3735213	16.01636	14.38577	21.55222	19.37413	21.55222	19.37413	21.14665	19.09564	21.14665	19.00444	21.38087	19.20809	16.01636	14.38577	21.55222	19.37413	21.55222	19.37413
382678.6	3735218	17.15076	15.19459	23.0625	20.56809	23.0625	20.56809	22.63216	20.18958	22.63216	20.12378	22.88952	20.40239	17.15076	15.28279	23.0625	20.56809	23.0625	20.56809
382807.6	3735167	14.82115	13.93645	19.96275	18.77806	19.96275	18.77806	19.5815	18.65497	19.5815	18.64047	19.79042	18.85213	14.82115	14.11855	19.96275	19.02056	19.96275	19.02056
382780.1	3735248	15.85012	14.50208	21.32944	19.52759	21.32944	19.52759	20.92822	19.15559	20.92822	19.15559	21.15982	19.36215	15.85012	14.50208	21.32944	19.68869	21.32944	19.62919
382843.3	3735202	14.69654	14.00915	19.79585	18.87349	19.79585	18.87349	19.41766	18.51121	19.41766	18.51121	19.62451	18.70687	14.69654	14.00915	19.79585	18.87349	19.79585	18.87349
382875.1	3735144	14.37472	13.42667	19.36969	18.10015	19.36969	18.10015	18.99672	17.74972	18.99672	17.74972	19.19584	17.93236	14.37472	13.42711	19.36969	18.10081	19.36969	18.10081
382891.3	3735191	14.43445	13.42816	19.44775	18.09891	19.44775	18.09891	19.07437	17.88395	19.07437	17.88395	19.2754	18.06946	14.43445	13.53024	19.44775	18.2365	19.44775	18.2365
382854.2	3735251	14.86443	14.02458	20.01803	18.89228	20.01803	18.89228	19.63708	18.53056	19.63708	18.53056	19.84804	18.7273	14.86443	14.02458	20.01803	18.89228	20.01803	18.89228
382907.6	3735238	14.36432	13.49087	19.35241	18.1818	19.35241	18.1818	18.98192	17.83147	18.98192	17.83147	19.18242	18.01718	14.36432	13.49087	19.35241	18.1818	19.35241	18.1818
382975.7	3735250	14.11791	12.97552	19.02555	17.49538	19.02555	17.49538	18.6584	17.15683	18.6584	17.15683	18.85316	17.33167	14.11791	12.97552	19.02555	17.49631	19.02555	17.49631
383017.7	3735273	14.0286	12.74561	18.9061	17.18869	18.9061	17.18869	18.5402	16.85468	18.5402	16.85468	18.73317	17.02518	14.0286	12.74561	18.9061	17.35022	18.9061	17.29332
383059.7	3735295	13.96805	12.66558	18.82555	17.08238	18.82555	17.08238	18.46045	16.74975	18.46045	16.74975	18.65206	16.92335	13.96805	12.66558	18.82555	17.08975	18.82555	17.08975
383101.7	3735317	13.87333	12.57847	18.69888	16.96548	18.69888	16.96548	18.33592	16.71943	18.33592	16.63443	18.52597	16.91114	13.87333	12.57847	18.69888	17.07569	18.69888	17.07569
383143.7	3735339	13.74858	12.47738	18.53188	16.89521	18.53188	16.89521	18.17237	16.66027	18.17237	16.56397	18.36022	16.82803	13.74858	12.54109	18.53188	16.99321	18.53188	16.99321
383185.7	3735361	13.61053	12.34616	18.3471	16.83709	18.3471	16.83709	17.99143	16.58285	17.99143	16.50605	18.17688	16.74949	13.61053	12.54104	18.3471	16.91509	18.3471	16.91509
383227.7	3735384	13.48024	12.33084	18.17266	16.63407	18.17266	16.63407	17.81965	16.33213	17.81965	16.30673	18.0028	16.49532	13.48024	12.3502	18.17266	16.65977	18.17266	16.65977
383269.7	3735406	13.338	12.15451	17.98252	16.39812	17.98252	16.39812	17.63256	16.12268	17.63256	16.12268	17.81319	16.28319	13.338	12.19063	17.98252	16.44622	17.98252	16.44622
383311.7	3735428	13.18774	12.10991	17.78166	16.33837	17.78166	16.33837	17.43552	16.01668	17.43552	16.01668	17.61332	16.17573	13.18774	12.10991	17.78166	16.33837	17.78166	16.33837
383353.6	3735450	13.05539	11.93831	17.60508	16.10949	17.60508	16.10949	17.26182	15.79189	17.26182	15.79189	17.43714	15.94769	13.05539	11.93831	17.60508	16.10949	17.60508	16.10949
383395.6	3735473	12.91893	11.80781	17.42297	15.93563	17.42297	15.93563	17.08288	15.62036	17.08288	15.62036	17.25561	15.77343	12.91893	11.80781	17.42297	15.93563	17.42297	15.93563
383437.6	3735495	12.7947	11.74456	17.25727	15.85109	17.25727	15.85109	16.91964	15.53731	16.91964	15.53731	17.08989	15.68912	12.7947	11.74456	17.25727	15.85109	17.25727	15.85109
383479.6	3735517	12.68516	11.67121	17.11127	15.75313	17.11127	15.75313	16.77526	15.44107	16.77526	15.44107	16.94318	15.59165	12.68516	11.67121	17.11127	15.75313	17.11127	15.75313
383521.6	3735539	12.56895	11.59335	16.95629	15.64908	16.95629	15.64908	16.62246	15.33912	16.62246	15.33912	16.78796	15.48817	12.56895	11.59335	16.95629	15.64908	16.95629	15.64908
383563.6	3735561	12.44403	11.53354	16.78967	15.56943	16.78967	15.56943	16.4584	15.26025	16.4584	15.26025	16.62148	15.40806	12.44403	11.53354	16.78967	15.56943	16.78967	15.56943
383605.6	3735584	12.31066	11.47667	16.61174	15.49365	16.61174	15.49365	16.28364	15.18508	16.28364	15.18508	16.44419	15.33169	12.31066	11.47667	16.61174	15.49365	16.61174	15.49365
383647.6	3735606	12.19404	11.40836	16.45629	15.38253	16.45629	15.38573	16.13039	15.09519	16.13039	15.09519	16.28867	15.24042	12.19404	11.40836	16.45629	15.40259	16.45629	15.40259
383689.6	3735628	12.09222	11.31323	16.32068	15.2757	16.32068	15.2757	15.99623	14.97039	15.99623	14.97039	16.15236	15.1138	12.09222	11.31323	16.32068	15.2757	16.32068	15.2757
382952.3	3735295	14.24144	13.36306	19.18838	18.01032	19.18838	18.01032	18.81976	17.66379	18.81976	17.66379	19.01785	17.84746	14.24144	13.36306	19.18838	18.01032	19.18838	18.01032
382994.3	3735317	14.1094	13.25838	19.01207	17.87038	19.01207	17.87038	18.6456	17.52526	18.6456	17.49246	18.8411	17.70697	14.1094	13.25838	19.01207	17.87038	19.01207	17.87038
383036.3	3735339	14.05819	13.02073	18.94419	17.55382	18.94419	17.55382	18.57825	17.21443	18.57825	17.21443	18.7724	17.39148	14.05819	13.02073	18.94419	17.55382	18.94419	17.55382
383078.3	3735361	13.96984	12.9362	18.82618	17.44094	18.82618	17.44094	18.46212	17.1026	18.46212	17.1026	18.65463	17.27786	13.96984	12.9362	18.82618	17.44094	18.82618	17.44094
383120.3	3735383	13.86322	12.84094	18.6839	17.3141	18.6839	17.3141	18.32257	16.97686	18.32257	16.97686	18.51301	17.15004	13.86322	12.84094	18.6839	17.3141	18.6839	17.3141
383162.3	3735406	13.72249	12.65995	18.49561	17.07297	18.49561	17.07297	18.13834	16.78242	18.13834	16.73882	18.3265	16.90819	13.72249	12.65995	18.49561	17.11737	18.49561	17.07297
383204.3	3735428	13.60481	12.45464	18.33836	16.79874	18.33836	16.79874	17.98318	16.57929	17.98318	16.46919	18.16906	16.74646	13.60481	12.53866	18.33836	16.91064	18.33836	16.91064
383246.3	3735450	13.45315	12.30747	18.13539	16.62428	18.13539	16.60148	17.78361	16.3286	17.78361	16.316	17.9668	16.49259	13.45315	12.34766	18.13539	16.65498	18.13539	16.65498
383288.3	3735472	13.29916	12.25523	17.92956	16.53147	17.92956	16.49487	17.5815	16.20729	17.5815	16.20729	17.76188	16.36957	13.29916	12.25523	17.92956	16.53147	17.92956	16.53147
383330.3	3735495	13.16137	12.10664	17.7456	16.33331	17.7456	16.33331	17.40086	16.01249	17.40086	16.01249	17.57863	16.17187	13.16137	12.10664	17.7456	16.33331	17.7456	16.33331
383372.3	3735517	13.02598	12.00243	17.56496	16.19427	17.56496	16.19427	17.22323	15.87558	17.22323	15.87558	17.39843	16.03296	13.02598	12.00243	17.56496	16.19427	17.56496	16.19427
383414.3	3735539	12.89654	11.83691	17.39227	15.97365	17.39227	15.97365	17.05327	15.65854	17.05327	15.65854	17.22587	15.81249	12.89654	11.83691	17.39227	15.97365	17.39227	15.97365
383456.3	3735561	12.78025	11.67913	17.23734	15.76327	17.23734	15.76327	16.90013	15.45161	16.90013	15.45161	17.07034	15.60257	12.78025	11.67913	17.23734	15.76327	17.23734	15.76327
383498.3	3735583	12.66433	11.51768	17.0828	15.54791	17.0828	15.54791	16.74749	15.24011	16.74749	15.24011	16.91543	15.38792	12.66433	11.51768	17.0828	15.54791	17.0828	15.54791
383540.2	3735606	12.54001	11.37279	16.91703	15.35483	16.91703	15.35483	16.58421	15.04997	16.58421	15.04997	16.74955	15.19495	12.54001	11.37279	16.91703	15.35483	16.91703	15.35483
383582.2	3735628	12.40721	11.29492	16.73982	15.25109	16.73982	15.25109	16.41009	14.94728	16.41009	14.94728	16.57294	15.09048	12.40721	11.29492	16.73982	15.25109	16.73982	15.25109
383624.2	3735650	12.276	11.23435	16.56473	15.17035	16.56473	15.17035	16.23799	14.86745	16.23799	14.86745	16.39835	15.00938	12.276	11.23435	16.56473	15.17035	16.56473	15.17035
383666.2	3735672	12.17464	11.1596	16.42976	15.07061	16.42976	15.07061	16.1045	14.76938	16.1045	14.76938	16.26253	14.90992	12.17464	11.1596	16.42976	15.07061	16.42976	15.07061
382886.9	3735317	15.04488	13.98487	20.2565	19.04861	20.2565	19.04861	19.87262	18.47728	19.87262	18.44438	20.08801	18.88523	15.04488	14.14357	20.2565	19.04861	20.2565	19.04861
382928.9	3735339	14.72462	13.84561	19.83033	18.71805	19.83033	18.71805	19.45239	18.29505	19.45239	18.29505	19.661	18.5558	14.72462	13.89561	19.83033	18.71805	19.83033	18.71805
382970.9	3735361	14.4867	13.65555	19.51315	18.39787	19.51315	18.39787	19.13956	18.04511	19.13956	18.01551	19.34328	18.2355	14.4867	13.65555	19.51315	18.39787	19.51315	18.39787
383012.9	3735383	14.28117	13.48671	19.24005	18.18831	19.24005	18.18831	18.8701	17.83955	18.8701	17.72025	19.0694	18.02678	14.28117	13.4982	19.24005	18.18831	19.24005	18.18831
383054.9	3735405	14.04096	13.32354	18.91955	17.95537	18.91955	17.95537	18.55494	17.6096	18.55494	17.3236	18.74953	17.79341	14.04096	13.32354	18.91955	17.95537	18.91955	17.95537
383096.9	3735428	13.81009	13.14086	18.61201	17.71243	18.61201	17.71243	18.25266	17.36966	18.25266	17.28626	18.44261	17.54945	13.81009	13.14086	18.61201	17.71243	18.61201	17.71243
383138.9	3735450	13.67907	13.05029	18.43722	17.59196	18.43722	17.59196	18.08135	17.2502	18.08135	17.1611	18.26893	17.42789	13.67907	13.05029	18.43722	17.59196	18.43722	17.59196
383180.9	3735472	13.56971	12.86673	18.29111	17.34699	18.29111	17.34699	17.93752	17.00911	17.93752	17.00911	18.12293	17.18333	13.56971	12.86673	18.29111	17.34699	18.29111	17.34699
383222.9	3735494	13.42991	12.60422	18.10401	16.99623	18.10401	16.99623	17.75336	16.66483	17.75336	16.66483	17.93639	16.83427	13.42991	12.60422	18.10401	16.99623	18.10401	16.99623
383264.9	3735517	13.28201	12.39794	17.9062	16.72105	17.9062	16.72105	17.55916	16.39441	17.55916	16.39441	17.73943	16.55976	13.28201	12.39794	17.9062	16.72105	17.9062	16.72105
383306.9	3735539	13.14722	12.24012	17.72621	16.51066	17.72621	16.51066	17.38252	16.18744	17.38252	16.18744	17.56034	16.34981	13.14722	12.24012	17.72621	16.51066	17.72621	16.51066
383348.9	3735561	13.02047	12.09511	17.55709	16.31728	17.55709	16.31728	17.21615	15.99738	17.21615	15.99738	17.39152	16.15685	13.02047	12.09511	17.55709	16.31728	17.55709	16.31728
383390.9	3735583	12.89292	11.95241	17.38697	16.12698	17.38697	16.12698	17.04865	15.81009	17.04865	15.81009	17.22158	15.96666	12.89292	11.95241	17.38697	16.12698	17.38697	16.12698
383432.9	3735605	12.77658	11.81022	17.23179	15.93738	17.23179	15.93738	16.8957	15.62358	16.8957	15.62358	17.06621	15.77738	12.77658	11.81022	17.23179	15.93738	17.23179	15.93738
383474.9	3735628	12.69048	11.67919	17.11741	15.76286	17.11741	15.76286	16.78227	15.45183	16.78227	15.45183	16.95081	15.60297	12.69048	11.67919	17.11741	15.76286	17.11741	15.76286
383516.9	3735650	12.5478	11.60896	16.92683	15.66881	16.92683	15.66881	16.59452	15.35951	16.59452	15.35951	16.76043	15.50954	12.5478	11.60896	16.92683	15.66881	16.92683	15.66881
383558.9	3735672	12.42202	11.51821	16.759	15.5479	16.759	15.5479	16.42957	15.24003	16.42957	15.24003	16.59301	15.38808	12.42202	11.51821	16.759	15.5479	16.759	15.5479
383600.9	3735694	12.28696	11.37847	16.57883	15.36179	16.57883	15.36179	16.25266	15.05644	16.25266	15.05644	16.41353	15.20156	12.28696	11.37847	16.57883	15.36179	16.57883	15.36179
383642.9	3735716	12.19493	11.24048	16.45637	15.178	16.45637	15.178	16.13143	14.87539	16.13143	14.87539	16.29025	15.01773	12.19493	11.24048	16.45637	15.178	16.45637	15.178
383741.9	3735620	11.9144	11.05751	16.08412	14.93497	16.08412	14.93497	15.76281	14.63577	15.76281	14.63577	15.91496	14.77411	11.9144	11.05751	16.08412	14.93497	16.08412	14.93497
383785.6	3735644	11.79678	10.97282	15.92725	14.82193	15.92725	14.82193	15.60842	14.5246	15.60842	14.5246	15.75842	14.66131	11.79678	10.97282	15.92725	14.82193	15.92725	14.82193
383722.6	3735678	12.00503	11.12662	16.20382	15.02616	16.20382	15.02616	15.88147	14.72648	15.88147	14.72648	16.03605	14.86668	12.00503	11.12662	16.20382	15.02616	16.20382	15.02616
383829.2	3735669	11.67057	10.8551	15.75879	14.66453	15.75879	14.66453	15.44318	14.371	15.44318	14.371	15.5908	14.50575	11.67057	10.8551	15.75879	14.66453	15.75879	14.66453
383785	3735704	11.84821	11.03856	15.995	14.90875	15.995	14.90875	15.6758	14.61094	15.6758	14.61094	15.82715	14.74939	11.84821	11.03856	15.995	14.90875	15.995	14.90875
383736.7	3735726	11.993	10.93554	16.18762	14.77147	16.18762	14.77147	15.86577	14.47627	15.86577	14.47627	16.02021	14.61271	11.993	10.93554	16.18762	14.77147	16.18762	14.77147
383759.7	3735538	11.68829	10.94835	15.78417	14.78444	15.78417	14.78444	15.4666	14.51061	15.4666	14.51061	15.61366	14.64654	11.68829	10.96209	15.78417	14.80873	15.78417	14.80873
383722.8	3735508	11.74666	11.12035	15.86217	15.01478	15.86217	15.01478	15.54351	14.73297	15.54351	14.73297	15.69167	14.87199	11.74666	11.13213	15.86217	15.03572	15.86217	15.03572
383788.9	3735500	11.48285	11.1254	15.51108	15.00841	15.51108	15.02138	15.19741	14.72437	15.19741	14.72437	15.33994	14.8634	11.48285	11.1254	15.51108	15.02656	15.51108	15.02656
383816.4	3735565	11.53724	10.8656	15.5826	14.67986	15.5826	14.67986	15.26846	14.38414	15.26846	14.38414	15.41264	14.51828	11.53724	10.8656	15.5826	14.67986	15.5826	14.67986
383748.2	3735465	11.53595	11.27105	15.58226	15.2143	15.58226	15.2211	15.26736	14.91482	15.26736	14.91482	15.41087	15.05645	11.53595	11.27105	15.58226	15.2211	15.58226	15.2211

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
383816.1	3735459	11.4128	11.059	15.41836	14.93861	15.41836	14.93861	15.10557	14.63698	15.10557	14.63698	15.24641	14.77433	11.4128	11.059	15.41836	14.93861	15.41836	14.93861
383850.5	3735504	11.31034	11.01856	15.28123	14.88394	15.28123	14.88394	14.97137	14.58447	14.97137	14.58447	15.1105	14.72152	11.31034	11.01856	15.28123	14.88394	15.28123	14.88394
383864.2	3735555	11.33878	10.84461	15.31833	14.65156	15.31833	14.65156	15.00866	14.35707	15.00866	14.35707	15.14878	14.49104	11.33878	10.84461	15.31833	14.65156	15.31833	14.65156
383857.3	3735611	11.47305	10.7857	15.49635	14.57257	15.49635	14.57257	15.18454	14.28003	15.18454	14.28003	15.32781	14.41312	11.47305	10.7857	15.49635	14.57257	15.49635	14.57257
383773.5	3735422	11.54681	11.0873	15.59731	14.97668	15.59731	14.97668	15.2814	14.67429	15.2814	14.67429	15.4247	14.81205	11.54681	11.0873	15.59731	14.97668	15.59731	14.97668
383673	3735451	11.75671	11.39414	15.87602	15.38103	15.87602	15.38103	15.55775	15.08711	15.55775	15.08711	15.70605	15.23132	11.75671	11.40241	15.87602	15.39628	15.87602	15.39628
383642.4	3735417	11.77067	11.46828	15.8949	15.4806	15.8949	15.4806	15.57643	15.1817	15.57643	15.1817	15.72487	15.32736	11.77067	11.47449	15.8949	15.49248	15.8949	15.49248
383611.7	3735384	11.79518	11.44991	15.92806	15.45927	15.92806	15.45927	15.60861	15.15542	15.60861	15.15542	15.75723	15.30057	11.79518	11.45404	15.92806	15.46542	15.92806	15.46542
383581.1	3735350	11.90293	11.42443	16.072	15.42582	16.072	15.42582	15.74988	15.11982	15.74988	15.11982	15.90051	15.26444	11.90293	11.42648	16.072	15.42887	16.072	15.42887
383550.4	3735317	11.99396	11.41589	16.19364	15.41344	16.19364	15.41344	15.86956	15.10603	15.86956	15.10603	16.02184	15.25012	11.99396	11.41594	16.19364	15.41529	16.19364	15.41529
383709.9	3735417	11.61611	11.25757	15.68947	15.20372	15.68947	15.20372	15.37305	14.89709	15.37305	14.89709	15.51807	15.03812	11.61611	11.25757	15.68947	15.20372	15.68947	15.20372
383679.2	3735383	11.70722	11.26582	15.81101	15.20766	15.81101	15.20766	15.4931	14.90806	15.4931	14.90806	15.63992	15.0491	11.70722	11.26582	15.81101	15.21505	15.81101	15.21505
383648.6	3735350	11.80234	11.26446	15.93804	15.21348	15.93804	15.21348	15.6179	14.90659	15.6179	14.90659	15.76651	15.04753	11.80234	11.26446	15.93804	15.21348	15.93804	15.21348
383617.9	3735316	11.89208	11.27405	16.05812	15.22641	16.05812	15.22641	15.73555	14.91963	15.73555	14.91963	15.88562	15.06076	11.89208	11.27405	16.05812	15.22641	16.05812	15.22641
383587.2	3735283	11.96197	11.27434	16.1516	15.22728	16.1516	15.22728	15.82726	14.92064	15.82726	14.92064	15.97864	15.06162	11.96197	11.27434	16.1516	15.22728	16.1516	15.22728
383746.7	3735383	11.64061	11.1033	15.72268	14.99859	15.72268	14.99859	15.40467	14.73024	15.40467	14.69488	15.54974	14.8326	11.64061	11.1033	15.72268	14.99859	15.72268	14.99859
383716.1	3735349	11.70981	11.13426	15.81506	15.04021	15.81506	15.04021	15.49583	14.76682	15.49583	14.76682	15.64227	14.87358	11.70981	11.13426	15.81506	15.04021	15.81506	15.04021
383685.4	3735316	11.75947	11.13205	15.88145	15.03757	15.88145	15.03757	15.56158	14.77925	15.56158	14.77925	15.70912	14.87065	11.75947	11.13205	15.88145	15.08491	15.88145	15.06069
383654.7	3735283	11.82152	11.16668	15.96454	15.084	15.96454	15.084	15.64298	14.80193	15.64298	14.80193	15.79147	14.91706	11.82152	11.16668	15.96454	15.10783	15.96454	15.09715
383624.1	3735249	11.88399	11.20391	16.04857	15.13433	16.04857	15.13433	15.72509	14.82835	15.72509	14.82835	15.87444	14.96748	11.88399	11.20391	16.04857	15.14491	16.04857	15.13433
383491.1	3735284	12.09394	11.48597	16.32686	15.50799	16.32686	15.50799	16.00157	15.20132	16.00157	15.20132	16.15609	15.34661	12.09394	11.48812	16.32686	15.50898	16.32686	15.50898
383446.4	3735262	12.17756	11.55347	16.43851	15.59919	16.43851	15.59919	16.11162	15.28944	16.11162	15.28944	16.26775	15.43591	12.17756	11.55514	16.43851	15.60109	16.43851	15.60159
383401.7	3735240	12.27494	11.61014	16.56897	15.67481	16.56897	15.67481	16.23946	15.36303	16.23946	15.36303	16.39723	15.51043	12.27494	11.6109	16.56897	15.67674	16.56897	15.67674
383357.1	3735217	12.35797	11.66672	16.68031	15.75002	16.68031	15.75002	16.34881	15.45555	16.34881	15.44165	16.50792	15.58987	12.35797	11.67007	16.68031	15.75642	16.68031	15.75642
383312.4	3735195	12.43997	11.83803	16.79081	15.97824	16.79081	15.97824	16.45697	15.67436	16.45697	15.67116	16.6171	15.82225	12.43997	11.84482	16.79081	15.99081	16.79081	15.99081
383267.7	3735173	12.51274	12.04023	16.88896	16.24897	16.88896	16.24897	16.55337	15.94277	16.55337	15.94277	16.71456	16.09732	12.51274	12.05139	16.88896	16.26761	16.88896	16.26761
383223.1	3735151	12.75408	12.22622	17.2119	16.49937	17.2119	16.49937	16.87084	16.19254	16.87084	16.19254	17.03627	16.35031	12.75408	12.24094	17.2119	16.52161	17.2119	16.52161
383178.4	3735129	13.01351	12.39914	17.55793	16.7313	17.55793	16.7313	17.21136	16.42169	17.21136	16.42169	17.3812	16.58245	13.01351	12.41476	17.55951	16.75468	17.55951	16.75468
383133.7	3735107	13.22534	12.51047	17.84021	16.88059	17.84021	16.88059	17.48998	16.56639	17.48998	16.56639	17.66329	16.72914	13.22534	12.52354	17.84021	16.88731	17.84021	16.88333
383089.1	3735085	13.34596	12.61061	18.00306	17.00942	18.00306	17.00942	17.65101	16.69745	17.65101	16.69745	17.82276	16.84355	13.34754	12.62174	18.00306	17.00942	18.00306	17.00942
383044.4	3735063	13.3987	12.6944	18.07441	17.12718	18.07441	17.12718	17.72195	16.80815	17.72195	16.87225	17.89536	16.95529	13.3987	12.6944	18.07441	17.12718	18.07441	17.12718
383513.3	3735239	12.08424	11.39438	16.31513	15.38818	16.31513	15.38818	15.98884	15.07869	15.98884	15.07869	16.14251	15.2217	12.08424	11.39438	16.31513	15.38818	16.31513	15.38818
383468.6	3735217	12.15471	11.4945	16.40955	15.52235	16.40955	15.52235	16.08192	15.21023	16.08192	15.21023	16.23692	15.35486	12.15471	11.4945	16.40955	15.52235	16.40955	15.52235
383423.9	3735195	12.24325	11.65944	16.52836	15.74318	16.52836	15.74318	16.19826	15.42706	16.19826	15.42706	16.35452	15.57453	12.24325	11.65944	16.52836	15.74318	16.52836	15.74318
383379.3	3735173	12.31018	11.77948	16.6185	15.90413	16.6185	15.90413	16.28665	15.58571	16.28665	15.58571	16.44395	15.73523	12.31018	11.77948	16.6185	15.90413	16.6185	15.90413
383334.6	3735150	12.43158	11.88725	16.78121	16.04918	16.78121	16.04918	16.44628	15.73493	16.44628	15.73493	16.60555	15.8861	12.43158	11.89288	16.78121	16.05668	16.78121	16.05668
383289.9	3735128	12.53781	12.03036	16.92392	16.24115	16.92392	16.24115	16.58644	15.93581	16.58644	15.91591	16.74741	16.06931	12.53781	12.03036	16.92392	16.24115	16.92392	16.24115
383245.2	3735106	12.69623	12.17784	17.13639	16.43908	17.13639	16.43908	16.79529	16.16684	16.79529	16.11044	16.9589	16.26619	12.69623	12.17784	17.13639	16.43908	17.13639	16.43908
383200.6	3735084	12.89943	12.30056	17.40869	16.60223	17.4083	16.59876	17.0622	16.27249	17.0622	16.27249	17.22917	16.43026	12.89943	12.30056	17.40869	16.60386	17.40869	16.60386
383155.9	3735062	13.07569	12.43315	17.64117	16.76249	17.64117	16.76249	17.29394	16.44803	17.29394	16.44803	17.46381	16.6084	13.07569	12.43324	17.6449	16.78136	17.6449	16.78136
383111.2	3735040	13.18559	12.56638	17.78773	16.95307	17.78773	16.95307	17.43869	16.63891	17.43869	16.63891	17.61062	16.80218	13.18559	12.57808	17.78773	16.96158	17.78773	16.95697
383066.6	3735018	13.23407	12.61835	17.85599	17.02688	17.85599	17.02688	17.50668	16.69047	17.50668	16.73257	17.67578	16.85412	13.23407	12.61835	17.85599	17.02688	17.85599	17.02688
383580.1	3735216	11.95944	11.26125	16.15009	15.21165	16.15009	15.21165	15.82466	14.90417	15.82466	14.90417	15.97508	15.04405	11.95944	11.26125	16.15009	15.21165	16.15009	15.21165
383535.4	3735194	12.02141	11.42094	16.23314	15.42529	16.23314	15.42529	15.90665	15.11385	15.90665	15.11385	16.05818	15.25654	12.02141	11.42094	16.23314	15.42529	16.23314	15.42529
383490.8	3735172	12.11669	11.59679	16.36061	15.66058	16.36061	15.66058	16.03257	15.34528	16.03257	15.34528	16.18593	15.4911	12.11669	11.59679	16.36061	15.66058	16.36061	15.66058
383446.1	3735150	12.2459	11.70973	16.53365	15.81204	16.53365	15.81204	16.20205	15.49388	16.20205	15.49388	16.3576	15.64158	12.2459	11.70973	16.53365	15.81204	16.53365	15.81204
383401.4	3735128	12.36697	11.80961	16.69606	15.94627	16.69606	15.94627	16.36145	15.62624	16.36145	15.62624	16.51896	15.77548	12.36697	11.80961	16.69606	15.94627	16.69606	15.94627
383356.8	3735106	12.46336	11.90737	16.82539	16.0779	16.82539	16.0779	16.48848	15.75451	16.48848	15.75451	16.64761	15.90511	12.46336	11.90737	16.82539	16.0779	16.82539	16.0779
383312.1	3735084	12.54414	12.00217	16.93395	16.20524	16.93395	16.20524	16.59519	15.87976	16.59519	15.87976	16.75552	16.03184	12.54414	12.00217	16.93395	16.20524	16.93395	16.20524
383267.4	3735061	12.60601	12.16309	17.01751	16.42073	17.01751	16.42073	16.67734	16.10771	16.67734	16.09151	16.83843	16.24637	12.60601	12.16309	17.01751	16.42073	17.01751	16.42073
383222.8	3735039	12.7208	12.23302	17.17148	16.47756	17.17148	16.47756	16.82831	16.2938	16.82831	16.1841	16.9913	16.34002	12.7208	12.23302	17.17148	16.51486	17.17148	16.51486
383178.1	3735017	12.85482	12.37782	17.35086	16.70787	17.35086	16.70787	17.00418	16.37513	17.00418	16.37513	17.16932	16.53392	12.85482	12.37782	17.35086	16.7082	17.35086	16.7082
383133.4	3734995	12.94884	12.56068	17.47295	16.94957	17.47295	16.94957	17.12787	16.63274	17.12787	16.63274	17.29483	16.79562	12.94884	12.57369	17.47651	16.94996	17.47651	16.94996
383088.8	3734973	13.04508	12.48956	17.60449	16.85561	17.60449	16.85561	17.25438	16.53554	17.25804	16.53554	17.42354	16.69748	13.04508	12.48956	17.60449	16.85981	17.60449	16.85561
383116.6	3734898	12.9952	12.45803	17.53679	16.81245	17.53679	16.81245	17.18714	16.47813	17.18808	16.47857	17.35567	16.63961	12.9952	12.45803	17.53679	16.81245	17.53679	16.81245
383135.3	3734857	12.94167	12.44376	17.46439	16.79203	17.46439	16.79203	17.11573	16.45908	17.11573	16.45908	17.2835	16.61929	12.94167	12.44376	17.46439	16.79203	17.46439	16.79203
383154	3734816	12.88136	12.42496	17.38302	16.76577	17.38302	16.76577	17.03535	16.4344	17.03535	16.4585	17.20225	16.59307	12.88136	12.4267	17.38302	16.76577	17.38302	16.76577
383172.7	3734774	12.8311	12.37929	17.31566	16.70317	17.31566	16.70317	16.96866	16.40588	16.96866	16.40588	17.13458	16.53046	12.8311	12.37929	17.31566	16.70317	17.31566	16.70317
383191.4	3734733	12.8095	12.38581	17.28682	16.64764	17.28682	16.64764	16.93976	16.37917	16.93976	16.37917	17.10516	16.47531	12.8095	12.38581	17.28682	16.64764	17.28682	16.64764
383162.2	3734919	12.83959	12.43985	17.32956	16.78791	17.32956	16.78791	16.9827	16.47783	16.9827	16.47783	17.14795	16.61459	12.83959	12.43985	17.32956	16.78791	17.32956	16.78791
383180.9	3734878	12.7806	12.34221	17.24995	16.65679	17.24995	16.65679	16.90412	16.35174	16.90412	16.35174	17.06848	16.48376	12.7806	12.34221	17.24995	16.65679	17.24995	16.65679
383199.6	3734836	12.74214	12.30005	17.19835	16.60033	17.19835	16.60033	16.85297	16.29369	16.85297	16.29369	17.01663	16.42693	12.74214	12.30005	17.19835	16.60033	17.19835	16.60033
383218.3	3734795	12.71892	12.30775	17.16733	16.61052	17.16733	16.61052	16.8219	16.30103	16.8219	16.30103	16.98505	16.4364	12.71892	12.30775	17.16733	16.61052	17.16733	16.61052
383237	3734753	12.69661	12.3173	17.13766	16.62349	17.13766	16.62349	16.79211	16.31079	16.79211	16.31079	16.95473	16.46297	12.69661	12.3244	17.13766	16.62349	17.13766	16.62349
383207.8	3734940	12.68029	12.30775	17.11806	16.61509	17.11806	16.61509	16.77431	16.28264	16.77431	16.28264	16.93599	16.43977	12.68029	12.30775	17.11806	16.61509	17.11806	16.61509
383226.5	3734898	12.65769	12.29846	17.08785	16.60304	17.08785	16.60119	16.74409	16.27001	16.74409	16.27001	16.90534	16.42675	12.65769	12.29846	17.08785	16.60304	17.08785	16.60304
383245.2	3734857	12.63665	12.30347	17.05977	16.6045	17.05977	16.59598	16.71593	16.27616	16.71593	16.27616	16.87665	16.43278	12.63665	12.30347	17.05977	16.61	17.05977	16.61
383263.9	3734815	12.6152	12.31165	17.03139	16.61351	17.03139	16.60476	16.68754	16.28643	16.68754	16.28643	16.84762	16.44305	12.6152	12.31165	17.03139	16.62124	17.03139	16.62124
383282.6	3734774	12.58807	12.29289	16.99534	16.59625	16.99534	16.59625	16.65151	16.26127	16.65151	16.26127	16.81104	16.41729	12.58807	12.29289	16.99534	16.59625	16.99534	16.59625
383171.7	3734669	12.89941	12.49431	17.40666	16.84281	17.40666	16.84264	17.05751	16.53547	17.05751	16.52086	17.22481	16.68354	12.89941	12.49431	17.40666	16.84281	17.40666	16.84281
383219.4	3734654	12.79283	12.40306	17.26511	16.73693	17.26511	16.73693	16.91712	16.41654	16.91712	16.41654	17.08193	16.57705	12.79283	12.41309	17.26511	16.73693	17.26511	16.73693
383164.4	3734606	12.97479	12.57194	17.50801	16.96444	17.50801	16.96282	17.15677	16.62521	17.15677	16.62521	17.32517	16.7885	12.97479	12.57194	17.50801	16.96444	17.50801	16.96444
383245.2	3734611	12.75782	12.40709	17.21915	16.73859	17.21915	16.73859	16.87091	16.40826	16.87091	16.40826	17.03466	16.56267	12.75782	12.40709	17.21915	16.73859	17.21915	16.73859
383286.9	3734703	12.60564	12.29819	17.01792	16.60181	17.01792	16.60181	16.67311	16.26693	16.67311	16.26693	16.83314	16.42367	12.60564	12.29819	17.01792	16.60181	17.01792	16.60181
383190.2	3734564	12.94998	12.58917	17.47571	16.98405	17.47571	16.98405	17.1238	16.64695	17.1238	16.64695	17.29119	16.80628	12.94998	12.58917	17.47571	16.98405	17.47571	16.98405
383069.6	3734667	13.28026	12.87297	17.91578	17.36732	17.91578	17.3613	17.55949	17.02156	17.55949	17.02156	17.73402	17.19025	13.28026	12.87297	17.91578	17.36732	17.91578	17.36732
383045.9	3734708	13.36785	12.87612	18.03353	17.3713	18.03353	17.3713	17.67533	17.04075	17.67533	17.04075	17.85113	17.20926	13.36785	12.88634	18.03353	17.3713	18.03353	17.3713
383057.1	3734619	13.36598	12.94577	18.03021	17.46451	18.03021	17.46451	17.67158	17.11659	17.67158	17.11659	17.84764	17.28662	13.36598	12.94577	18.03021	17.46451	18.03021	17.46451
383002.7	3734683	13.67553	13.19346	18.44461	17.79713	18.44461	17.79713	18.08827	17.44751	18.10909	17.44751	18.26089	17.61795	13.69865	13.19623	18.44461	17.79713	18.44461	17.79713
383013.9	3734593	13.63397	13.15138	18.38817	17.73972	18.38817	17.73972	18.02349	17.38672	18.02349	17.38672	18.20446	17.56024	13.63397	13.15138	18.38817	17.73972	18.38817	17.73972
383113.7	3734552	13.18995	12.89033	17.79522	17.38988	17.79522	17.38988	17.43979	17.04798	17.47101	17.05207	17.61225	17.21121	13.18995	12.89797	17.79522	17.38988	17.79522	17.38988
382959.5	3734657	13.96643	13.3616	18.83288	18.00423	18.83288	18.00423	18.46088	17.66443	18.46088	17.66443	18.64788	17.82448	13.96643	13.3616	18.83288	18.00423	18.83288	18.00423
382935.8	3734698	14.03286	13.36165	18.92089	18.00544	18.92089	18.00544	18.54828	17.66488	18.54828	17.66488	18.73698	17.82659	14.03286	13.36165	18.92089	18.00544	18.92089	18.00544
383126.3	3734636	13.0688	12.74119	17.63287	17.1776	17.63287	17.1776	17.28102	16.84759	17.28102	16.84759	17.45161	17.0143	13.0688	12.74119	17.63287	17.19002	17.63287	17.18847
382881.5	3734689	14.28091	13.54058	19.25023	18.24147	19.25023	18.24147	18.8731	17.89913	18.8731	17.89913	19.06732	18.06366	14.28091	13.54058	19.25023	18.24147	19.25023	18.24147
382864.9	3734641	14.43094	13.67877	19.45031	18.44297	19.45031	18.44297	19.06934	18.08025	19.06934	18.08025	19.26639	18.26445	14.43094	13.67877	19.45031	18.44297	19.45031	18.44297
382929.6	3734619	14.16644	13.49786	19.09944	18.2026	19.09944	18.2026	18.72299	17.84287	18.72299	17.84287	18.91406	18.0215	14.16644	13.49786	19.09944	18.2026	19.09944	18.2026

Reduction to Peak C		0.0010	0.0009	0.0037	0.0035	0.0037	0.0034	0.0021	0.0019	0.0021	0.0019	0.0058	0.0055	0.0014	0.0013	0.0055	0.0052	0.0055	0.0052
Percent Reduction D		48.55%	48.55%	44.40%	44.40%	44.40%	44.40%	78.71%	78.71%	78.71%	78.71%	70.88%	70.88%	67.78%	67.78%	66.42%	66.42%	66.42%	66.42%
		389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389200_3740100	389450_3739850	389200_3740100	382683.8_3734051.76	382683.8_3734051.76	389450_3739850	389450_3739850	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76	382683.8_3734051.76
Peak Concentration		3.755034	3.661377	15.51017	14.64333	15.51017	14.63191	4.995903	4.510162	4.995903	4.510162	15.37303	14.54545	3.755034	3.661377	15.51017	14.67307	15.51017	14.67307
X	Y	*2033_ALT4_CAAQS*	*2033_ALT4_NAAQS*	*2033_ALT5_CAAQS*	*2033_ALT5_NAAQS*	*2033_PP_CAAQS*	*2033_PP_NAAQS*	*2038_ALT1_CAAQS*	*2038_ALT1_NAAQS*	*2038_NP_CAAQS*	*2038_NP_NAAQS*	*2038_ALT3_CAAQS*	*2038_ALT3_NAAQS*	*2038_ALT4_CAAQS*	*2038_ALT4_NAAQS*	*2038_ALT5_CAAQS*	*2038_ALT5_NAAQS*	*2038_PP_CAAQS*	*2038_PP_NAAQS*
382820.5	3734619	14.66048	13.85616	19.75569	18.62985	19.75569	18.62985	19.37036	18.313	19.37036	18.313	19.57227	18.45237	14.66048	13.85616	19.75569	18.62985	19.75569	18.62985
382913	3734572	14.32362	13.65328	19.30932	18.4038	19.30932	18.4038	18.92892	18.03991	18.92892	18.04909	19.12277	18.22234	14.32362	13.655	19.30932	18.4038	19.30932	18.4038
382765.6	3734635	14.90327	14.10812	20.07901	19.01437	20.07901	19.01437	19.68968	18.64411	19.68968	18.64411	19.89681	18.83737	14.90327	14.10812	20.07901	19.01437	20.07901	19.01437
382746.9	3734571	15.05654	14.22176	20.28313	19.16621	20.28313	19.16621	19.8911	18.79287	19.8911	18.79287	20.10134	18.98816	15.05654	14.22176	20.28313	19.16621	20.28313	19.16621
382847.7	3734563	14.65174	13.87268	19.74563	18.57361	19.74563	18.57361	19.359	18.33491	19.359	18.33491	19.55995	18.39391	14.65174	13.87268	19.74563	18.57361	19.74563	18.57361
382768.1	3734526	15.0203	14.21989	20.23519	19.1639	20.23519	19.1639	19.84309	18.78985	19.84309	18.78985	20.05236	18.98503	15.0203	14.21989	20.23519	19.1639	20.23519	19.1639
382784.2	3734476	15.0257	14.23683	20.24301	19.18704	20.24301	19.18331	19.84998	18.81201	19.84998	18.81201	20.05902	19.00652	15.0257	14.23683	20.24301	19.18704	20.24301	19.18704
382802.4	3734430	14.99254	14.17852	20.1991	19.04427	20.1991	19.04427	19.80596	18.73539	19.80596	18.73539	20.0141	18.92818	14.99254	14.17852	20.1991	19.08907	20.1991	19.05146
382820.6	3734384	14.92394	14.10811	20.10737	18.90351	20.10737	18.90351	19.71519	18.58439	19.71519	18.64242	19.92209	18.77587	14.92394	14.10811	20.10737	18.9568	20.10737	18.9564
382838.8	3734337	14.85242	14.10124	20.01207	18.8512	20.01207	18.8512	19.62105	18.50876	19.62105	18.6329	19.82642	18.67174	14.85242	14.10124	20.01207	18.8512	20.01207	18.8512
382857	3734291	14.80498	14.02918	19.94934	18.84952	19.94934	18.84952	19.55857	18.47909	19.55857	18.53817	19.76262	18.66916	14.80498	14.02918	19.94934	18.84952	19.94934	18.84952
382830.7	3734495	14.83865	13.97947	19.99461	18.77165	19.99461	18.77165	19.60444	18.4755	19.60444	18.4755	19.80805	18.59072	14.83865	13.97947	19.99461	18.77165	19.99461	18.77165
382848.9	3734448	14.78909	13.97386	19.92926	18.77158	19.92926	18.77158	19.53878	18.46743	19.53878	18.46743	19.742	18.58979	14.78909	13.97386	19.92926	18.77158	19.92926	18.77158
382867.1	3734402	14.707	13.91527	19.81929	18.6966	19.81929	18.6966	19.43004	18.38969	19.43004	18.38969	19.63182	18.51497	14.707	13.91527	19.81929	18.6966	19.81929	18.6966
382885.3	3734356	14.6187	13.89108	19.70134	18.57114	19.70134	18.53764	19.31356	18.35713	19.31356	18.35713	19.51373	18.54216	14.6187	13.89108	19.70134	18.72344	19.70134	18.57374
382903.5	3734309	14.56411	13.89945	19.62893	18.73533	19.62893	18.73533	19.24163	18.3678	19.24163	18.3678	19.44039	18.55565	14.56411	13.89945	19.62893	18.73653	19.62893	18.73653
382877.3	3734513	14.59982	13.80279	19.6766	18.51285	19.6766	18.51285	19.291	18.24354	19.291	18.24354	19.49019	18.33146	14.59982	13.80279	19.6766	18.51326	19.6766	18.51285
382895.5	3734467	14.53359	13.8051	19.58904	18.42892	19.58904	18.42892	19.2033	18.24559	19.2033	18.24559	19.40114	18.43114	14.53359	13.8051	19.58932	18.55929	19.58904	18.42892
382913.7	3734420	14.43527	13.78486	19.45732	18.58554	19.45732	18.58554	19.07309	18.21773	19.07309	18.21773	19.26928	18.4032	14.43527	13.78486	19.45732	18.58554	19.45732	18.58554
382931.9	3734374	14.34559	13.69001	19.33754	18.45856	19.33754	18.45856	18.95483	18.09257	18.95483	18.09257	19.14921	18.27624	14.34559	13.69001	19.33754	18.45856	19.33754	18.45856
382950.1	3734328	14.30055	13.67828	19.27809	18.44367	19.27809	18.44367	18.89552	18.07709	18.89552	18.07709	19.0887	18.26012	14.30055	13.67828	19.27809	18.44367	19.27809	18.44367
382871.9	3734241	14.81239	14.08805	19.96022	18.77625	19.96022	18.77625	19.56835	18.57257	19.56835	18.61501	19.77203	18.59409	14.81239	14.08805	19.96022	18.77625	19.96022	18.77625
382885.3	3734196	14.80494	14.1303	19.95142	19.00351	19.95142	19.00351	19.55898	18.66985	19.55898	18.66985	19.76196	18.81944	14.80494	14.1303	19.95142	19.00351	19.95142	19.00351
382919.8	3734255	14.63354	14.00688	19.72406	18.884	19.72406	18.88315	19.33347	18.5091	19.33347	18.5091	19.53241	18.69761	14.63354	14.00688	19.72406	18.884	19.72406	18.884
382933.3	3734210	14.59725	14.01084	19.67627	18.88931	19.67627	18.88931	19.28587	18.51355	19.28587	18.51392	19.48383	18.70209	14.59725	14.01084	19.67627	18.88931	19.67627	18.88931
382967.8	3734270	14.48874	13.89873	19.53534	18.74397	19.53534	18.74397	19.14546	18.36892	19.14546	18.36892	19.33951	18.55339	14.48874	13.89873	19.53534	18.74397	19.53534	18.74397
382981.2	3734224	14.46338	13.89879	19.50223	18.7442	19.50223	18.7442	19.11203	18.37313	19.11203	18.37313	19.30517	18.55231	14.46338	13.9022	19.50223	18.7442	19.50223	18.7442
382876.7	3734151	14.92135	14.20097	20.1071	19.13229	20.1071	19.12377	19.71158	18.7625	19.71158	18.7625	19.91653	18.95537	14.92135	14.20097	20.1071	19.13229	20.1071	19.13229
382827.3	3734088	15.28482	14.37017	20.5895	19.33771	20.5895	19.33771	20.18829	18.98341	20.18829	18.9846	20.40047	19.17993	15.28482	14.37017	20.59192	19.35079	20.59192	19.33771
382925.8	3734141	14.65355	14.08786	19.75097	18.99105	19.75097	18.99105	19.3599	18.61324	19.3599	18.61324	19.55914	18.80353	14.65355	14.08786	19.75097	18.99105	19.75097	18.99105
382891.4	3734088	14.9236	14.21938	20.11128	19.16493	20.11128	19.16493	19.71439	18.78449	19.71439	18.78612	19.91888	18.97745	14.9236	14.21938	20.11128	19.16493	20.11128	19.16493
382842	3734025	15.33469	14.44991	20.66026	19.47393	20.66026	19.47393	20.25367	19.08871	20.25367	19.0889	20.46577	19.2861	15.33469	14.44991	20.66026	19.47393	20.66026	19.47393
382970	3734121	14.47614	13.95439	19.51624	18.81228	19.51624	18.81228	19.12681	18.43598	19.12681	18.43858	19.32153	18.62283	14.47614	13.95439	19.51624	18.81228	19.51624	18.81228
382930.7	3734057	14.70809	14.14413	19.82472	19.06526	19.82472	19.06526	19.43188	18.68512	19.43188	18.68649	19.63171	18.87611	14.70809	14.14413	19.82472	19.06526	19.82472	19.06526
382881.3	3733995	15.12205	14.33931	20.3775	19.32444	20.3775	19.32444	19.97477	18.94052	19.97477	18.94346	20.18235	19.13527	15.12205	14.33931	20.3775	19.32444	20.3775	19.32444
382783.6	3734041	15.60686	14.63209	21.02131	19.7143	21.02131	19.71252	20.61039	19.32767	20.61039	19.32792	20.82866	19.52965	15.60686	14.63209	21.02131	19.71491	21.02131	19.71491
382704.1	3734006	16.12671	15.24397	21.71466	20.52533	21.71466	20.52533	21.29239	20.12471	21.29239	20.13075	21.52098	20.3388	16.12671	15.24397	21.71466	20.52533	21.71466	20.52533
382624.7	3733971	16.82833	15.98897	22.64967	21.52442	22.64967	21.52442	22.21376	21.10834	22.21376	21.10834	22.45661	21.33719	16.82833	15.98897	22.64967	21.52442	22.64967	21.52442
382545.2	3733935	17.56116	16.66658	23.62569	22.42731	23.62569	22.42731	23.17618	21.99719	23.17618	21.99719	23.43423	22.23963	17.56116	16.66658	23.62569	22.42731	23.62569	22.42731
382804	3733996	15.61056	14.66842	21.02827	19.76113	21.02827	19.76113	20.61541	19.37141	20.61541	19.37615	20.83287	19.5731	15.61056	14.66842	21.02827	19.76113	21.02827	19.76113
382724.5	3733960	16.07127	15.18412	21.64127	20.44413	21.64127	20.44413	21.2195	20.0515	21.2195	20.0515	21.44665	20.2567	16.07127	15.18412	21.64127	20.44413	21.64127	20.44413
382645	3733925	16.72089	15.88512	22.50697	21.38598	22.50697	21.38598	22.07282	20.97151	22.07282	20.97151	22.31323	21.19809	16.72089	15.88512	22.50697	21.38598	22.50697	21.38598
382565.5	3733890	17.49338	16.57359	23.53628	22.30416	23.53628	22.30416	23.08728	21.87506	23.08728	21.87506	23.34351	22.1153	17.49338	16.57359	23.53628	22.30416	23.53628	22.30416
382824.3	3733950	15.55531	14.5782	20.95555	19.63676	20.95555	19.63676	20.54294	19.25783	20.54294	19.25783	20.75881	19.4475	15.55531	14.5782	20.95555	19.63676	20.95555	19.63676
382744.8	3733915	16.07102	15.16608	21.64278	20.4296	21.64278	20.4296	21.21938	20.02866	21.21938	20.02866	21.44561	20.23991	16.07102	15.16608	21.64278	20.4296	21.64278	20.4296
382665.3	3733879	16.58316	15.73431	22.32371	21.18468	22.32371	21.18468	21.89197	20.77291	21.89197	20.77291	22.12953	20.99654	16.58316	15.73431	22.32371	21.18468	22.32371	21.18468
382585.8	3733844	17.35055	16.44849	23.34612	22.13701	23.34612	22.13701	22.89971	21.71018	22.89971	21.71018	23.1529	21.94796	17.35055	16.44849	23.34612	22.13701	23.34612	22.13701
382461.5	3733897	18.28071	17.34709	24.58353	23.3322	24.58353	23.3322	24.1198	22.8894	24.1198	22.8894	24.3929	23.14651	18.28071	17.34709	24.58353	23.3322	24.58353	23.3322
382417	3733877	18.64432	17.81347	25.06737	23.95254	25.06737	23.95254	24.59681	23.50054	24.59681	23.50054	24.87758	23.7676	18.64432	17.81347	25.06737	23.95254	25.06737	23.95254
382372.5	3733856	19.09828	18.51077	25.6718	24.8808	25.6718	24.8808	25.19241	24.41471	25.19241	24.41471	25.48247	24.69622	19.09828	18.51077	25.6718	24.8808	25.6718	24.8808
382328	3733836	19.59873	19.20274	26.33831	25.80192	26.33831	25.80192	25.84899	25.32128	25.84899	25.32128	26.1495	25.61695	19.59873	19.20274	26.33831	25.80192	26.33831	25.80192
382283.4	3733815	20.13977	19.58338	27.05881	26.30867	27.05881	26.30867	26.55895	25.8215	26.55895	25.8215	26.87054	26.12531	20.13977	19.58338	27.05881	26.30867	27.05881	26.30867
382238.9	3733794	20.73345	20.09509	27.84943	26.99976	27.84943	26.99976	27.3376	26.50273	27.3376	26.50273	27.66143	26.81737	20.73345	20.09509	27.84943	26.99976	27.84943	26.99976
382194.4	3733774	21.36967	20.44953	28.69694	27.47137	28.69694	27.47137	28.17147	26.96753	28.17147	26.95751	28.50806	27.28956	21.36967	20.44953	28.69694	27.47137	28.69694	27.47137
382482.5	3733852	18.23639	17.20645	24.52559	23.14586	24.52559	23.14586	24.06165	22.70501	24.06165	22.70501	24.33325	22.95873	18.23639	17.20645	24.52559	23.14586	24.52559	23.14586
382438	3733831	18.60949	17.67801	25.02212	23.77318	25.02212	23.77318	24.5513	23.3231	24.5513	23.3231	24.83076	23.58685	18.60949	17.67801	25.02212	23.77318	25.02212	23.77318
382393.5	3733811	19.01581	18.36384	25.56301	24.68598	25.56301	24.68598	25.08431	24.22205	25.08431	24.22205	25.37217	24.50008	19.01581	18.36384	25.56301	24.68598	25.56301	24.68598
382349	3733790	19.48174	19.05712	26.1832	25.60865	26.1832	25.60865	25.6956	25.13042	25.6956	25.13042	25.99327	25.42285	19.48174	19.05712	26.1832	25.60865	26.1832	25.60865
382304.4	3733770	20.02323	19.54388	26.90435	26.25673	26.90435	26.25673	26.40612	25.76952	26.40612	25.76952	26.71498	26.07212	20.02323	19.54388	26.90435	26.25673	26.90435	26.25673
382259.9	3733749	20.59445	20.03682	27.66515	26.9212	27.66515	26.9212	27.15554	26.42477	27.15554	26.42477	27.47612	26.73795	20.59445	20.03682	27.66515	26.9212	27.66515	26.9212
382215.4	3733728	21.24924	20.25954	28.53738	27.21666	28.53738	27.21666	28.01365	26.7159	28.01365	26.71423	28.34751	27.03367	21.24924	20.25954	28.53738	27.21666	28.53738	27.21666
382503.5	3733807	18.15918	17.14362	24.4235	23.06278	24.4235	23.06278	23.96041	22.62241	23.96041	22.62241	24.22999	22.87444	18.15918	17.14362	24.4235	23.06278	24.4235	23.06278
382459	3733786	18.52895	17.53884	24.91559	23.5883	24.91559	23.5883	24.44567	23.14042	24.44567	23.14042	24.72319	23.40097	18.52895	17.53884	24.91559	23.5883	24.91559	23.5883
382414.5	3733765	18.92079	18.19372	25.43729	24.46003	25.43729	24.46003	24.95971	23.99893	24.95971	23.99893	25.24525	24.27309	18.92079	18.19372	25.43729	24.46003	25.43729	24.46003
382369.9	3733745	19.38147	18.92513	26.05082	25.43394	26.05082	25.43394	25.56424	24.9577	25.56424	24.9577	25.85931	25.24688	19.38147	18.92513	26.05082	25.43394	26.05082	25.43394
382325.4	3733724	19.93101	19.52852	26.78271	26.23734	26.78271	26.23734	26.28529	25.74939	26.28529	25.74939	26.59166	26.05117	19.93101	19.52852	26.78271	26.23734	26.78271	26.23734
382280.9	3733704	20.44861	19.9772	27.47166	26.83386	27.47166	26.83386	26.96445	26.3383	26.96445	26.3383	27.28169	26.64981	20.44861	19.9772	27.47166	26.83386	27.47166	26.83386
382236.4	3733683	21.11843	20.22888	28.36399	27.16928	28.36399	27.16928	27.84228	26.66848	27.84228	26.66848	28.1731	26.98508	21.11843	20.22888	28.36399	27.16928	28.36399	27.16928
382173.9	3733684	21.82604	21.17419	29.30542	28.42674	29.30542	28.42674	28.76939	27.90644	28.76939	27.90644	29.11504	28.24295	21.82604	21.17419	29.30542	28.42674	29.30542	28.42674
382096.2	3733669	23.15458	22.16962	31.075	29.75302	31.075	29.75302	30.51114	29.21169	30.51114	29.21169	30.88373	29.56815	23.15458	22.16962	31.075	29.75302	31.075	29.75302
382183	3733635	21.89545	21.20408	29.39902	28.46791	29.39902	28.46791	28.86077	27.9458	28.86077	27.9458	29.20728	28.28217	21.89545	21.20408	29.39902	28.46791	29.39902	28.46791
382105.4	3733620	23.20698	22.12598	31.14553	29.69568	31.14553	29.69568	30.58	29.15467	30.58	29.15467	30.95326	29.50991	23.20698	22.12598	31.14553	29.69568	31.14553	29.69568
382256.9	3733611	20.92494	20.1249	28.10587	27.02959	28.10587	27.02959	27.58783	26.53038	27.58783	26.53038	27.91468	26.84517	20.92494	20.1249	28.10587	27.02959	28.10587	27.02959
382308.6	3733648	20.24951	19.7187	27.20706	26.4899	27.20706	26.4899	26.70337	25.99901	26.70337	25.99901	27.0163	26.3051	20.24951	19.7187	27.20706	26.4899	27.20706	26.4899
382192.2	3733585	21.86594	21.1583	29.36005	28.4071	29.36005	28.4071	28.82225	27.88549	28.82225	27.88549	29.16799	28.22089	21.86594	21.1583	29.36005	28.4071	29.36005	28.4071
382114.5	3733571	23.21462	22.05374	31.15621	29.59994	31.15621	29.59994	30.59005	29.05997	30.59005	29.05997	30.96327	29.41361	23.21462	22.05374	31.15621	29.59994	31.15621	29.59994
382137.1	3733720	22.22754	21.47996	29.83975	28.83415	29.83975	28.83415	29.29581	28.30776	29.29581	28.30776	29.64982	28.65044	22.22754	21.47996	29.83975	28.83415	29.83975	28.83415
382053.5	3733594	24.25206	23.17255	32.53737	31.08954	32.53737	31.08954	31.95013	30.52644	31.95013	30.52644	32.34476	30.90308	24.25206	23.17255	32.53737	31.08954	32.53737	31.08954
382054.7	3733544	24.41209	23.27413	32.75087	31.22492	32.75087	31.22492	32.16024	30.65966	32.16024	30.65966	32.55808	31.03827	24.41209	23.27413	32.75087	31.22492	32.75087	31.22492
382118.9	3733507	23.36363	22.13997	31.35539	29.71513	31.35539	29.71513	30.78584	29.17289	30.78584	29.17289	31.16172	29.52791	23.36363	22.13997	31.35539	29.71513	31.35539	29.71513
382171.4	3733530	22.2907	21.61771	29.92694	29.01993	29.92694	29.01993	29.37938	28.48783	29.37938	28.48783	29.73319	28.8321	22.2907	21.61771	29.92694	29.01993	29.92694	29.01993
382056	3733494	24.60197	23.32743	33.00443	31.2967	33.00443	31.2967	32.40982	30.73036	32.40982	30.73036	32.81121	31.10981	24.60197	23.32743	33.00443	31.2967	33.00443	31.2967

3.2.10 Changes Made to Appendix B.4, Draft General Conformity Determination

Section 3-1, Page 3-2

Revise the first bullet, as follows:

- The proposed improvements at Berths 230-232 are also designed to accommodate larger ships and would include: 1) dredging to increase the depth from -45 to -47 feet MLLW plus two feet of over depth tolerance (for a total of -49 feet MLLW); and 2) the installation of approximately 1,400 linear feet of sheet piles to stabilized the wharf.

Revise the second bullet, as follows:

- The LAHD has proposed to dispose of approximately 38,000 cubic yards of dredged materials (30,000 cubic yards from Berths 226-229 and 8,000 cubic yards from Berths 230-232) at an approved ocean disposal site (i.e., LA-2), an approved upland disposal facility, or a combination of the two. However, the Los Angeles Region Dredged Materials Management Team/Contaminated Sediments Task Force has evaluated the sediments and determined all the dredged material is suitable for ocean disposal at LA-2. Approval of ocean disposal by the USACE and USEPA is pending.

Revise MM AQ-5, as follows:

MM AQ-5: General Construction Mitigation Measure. All dredging equipment must be electric; however, this is subject to availability of the equipment. For MM AQ-1 through MM AQ-4, if a California Air Resources Board (CARB)-certified technology becomes available that is as good as or better than the existing measure in terms of emissions performance, the technology could replace the existing technology if approved by LAHD

Section 3-1, Page 3-3

Delete the final paragraph and MM AQ-6, as follows:

~~In addition, the following measure will reduce operational impacts associated with the delivery by cargo ship of the new wharf cranes:~~

~~**MM AQ-6: Vessel Speed Reduction Program (VSRP).** Starting January 1, 2019 and thereafter, 95 percent of Evergreen ships calling at the Everport Container Terminal shall be required to comply with the expanded VSRP at 12 knots between 40 nm from Point Fermin and the Precautionary Area. Starting January 1, 2026, 95 percent of all ships calling at the Everport Container Terminal will follow this requirement. Alternative Compliance Plans will be considered where a different speed that would result in fewer emissions compared to the current speed limits.~~

~~Any alternative compliance plan shall be submitted to LAHD at least 90 days in advance for approval and shall be supported by data that demonstrates the ability of the alternative compliance plan for the specific vessel and type to achieve emissions~~

~~reductions comparable to or greater than those achievable by compliance with VSRP. The alternative compliance plan shall be implemented once written notice of approval is granted by the LAHD.~~

Section 4-2, Pages 4-1 through 4-2

Revise the last sentence in the final paragraph, as follows:

The emission estimating process is discussed in more detail in Berths 226-236 [Everport] Container Terminal Improvements Project Draft EIS/EIR (see Section 3.2, Air Quality and Meteorology, and Appendix B of the Draft EIS/EIR – USACE/~~US~~LAHD 2017a).

Section 5-3, Page 5-3, Table 5-2

Revise Table 5-1, as follows:

Table 5-2 General Conformity *de minimis* Thresholds for the South Coast Air Basin

Criteria Pollutant: and Quantified Precursors	SCAB Attainment Status Designations	*de minimis* Threshold tons per year (tpy)
Nitrogen Dioxide: **NOx**	Attainment/Maintenance	--- 100
Ozone: **NOx** **VOC**	Nonattainment/Extreme	--- 10 10
Carbon Monoxide	Attainment/Maintenance	100
Particulate Matter PM_{10}	Attainment/Maintenance	100
Particulate Matter $PM_{2.5}$: **Directly Emitted $PM_{2.5}$** **SOx** **NOx** **VOC**	Nonattainment/Serious	--- 70 70 70 70
Lead	Nonattainment	25

Source: 40 CFR § 93.153(b)(1)

Section 5-4, Page 5-3

Add a new sentence to the paragraph following Table 5-3, as follows:

The total of direct and indirect emissions of VOC, CO, SOx, PM10, and PM2.5 from the federal action are less than the general conformity de minimis threshold emission rates shown in Table 5-2. In addition, the federal action does not generate lead (Pb) emissions. Therefore, the general conformity regulations do not apply to these pollutants, and no additional conformity evaluation need be made for these pollutants.

Section 8-2, Page 8-1

Revise the second sentence in the paragraph, as follows:

On behalf of t~~T~~he USACE, LAHD will also place a notice in a daily newspaper of general circulation in the SCAB announcing the availability of its final GCD within 30 days of its promulgation.

Section 10, Page 10-2

Revise the fourth reference, as follows:

U.S. Army Corps of Engineers/Los Angeles Harbor Department (USACE/LAHD). 2017. Berths 226- 236 [Everport] Container Terminal I~~i~~mprovements Project Draft EIS/EIR. April.

Revise the page number, as follows:

3.2.11 Changes Made to Appendix F.2, Evaluation of Dredged Material Disposal Option

Page 10

Revise first two paragraphs under "Impacts of Ocean Disposal" on Page 10, as follows:

IMPACTS of OCEAN DISPOSAL

The environmental impacts from ocean disposal at LA-2 were considered during the site designation process, and re-evaluated at an increased disposal volume (USEPA and USACE 2005). Impacts to water quality, sediment quality, and biological resources were considered "not significant." The continued use of the site to dispose of sediments that meet the acceptance criteria, including disposal of sediments from the Everport Container Terminal, is unlikely to interfere with other ocean uses, such as shipping, fishing, recreation, and oil and gas development. Based on the results of the sediment characterization study, the sediments to be dredged from the proposed Project site are suitable for disposal at LA-2. The testing also confirmed there would be little to no risk of bioaccumulation or risk to humans, marine life, and the marine environment from ocean disposal.

Impacts to Aesthetic, Recreational, and Economic Values

The environmental impacts from ocean disposal at LA-2 were considered during the site designation process, and re-evaluated at an increased disposal volume (USEPA and USACE 2005). Dredged material disposal activities have occurred at LA-2 since the late 1970s. The continued use of the site is unlikely to interfere with other ocean uses, such as shipping, fishing, and recreation. The disposal of sediments from the Everport Container Terminal would not result in an unacceptable aesthetic nuisance in recreational areas, nor contain pathogenic organisms that may cause a public health hazard, either directly or through contamination of the marine environment, fisheries or shell fisheries. The disposal of materials considered hazardous is prohibited at LA-2. The dredged material would not contain chemical constituents that ~~may affect~~ would adversely affect marine life or humans directly, or that may bioaccumulate or persist, and subsequently have an adverse effect on the marine environment, on humans directly or through food chain interactions (Ramboll Environ 2015).

3.3 Additional Appendices

Investigation of 2033 HRA Start Year for the Everport Container Terminal Improvements Project

Attached is the Investigation of 2033 HRA Start Year for the Everport Container Terminal Improvements Project.

Additional Appendix

Investigation of 2033 HRA Start Year for the Everport Container Terminal Improvements Project

Castle Environmental Consulting, LLC

Memorandum

To: Port of Los Angeles Environmental Management Division

From: John Castleberry/CEC

Date: 8/14/2017

Re: **Investigation of 2033 HRA Start Year for the Everport Container Terminal Improvements Project**

The estimate of cancer risk in the DEIS/EIR for the Everport Container Terminal Improvements Project assumed an exposure period start year of 2018. The 2018 start year was conservatively selected to capture the combined effect of construction and operational emissions during the first two years of the 30-year exposure period. Moreover, the risk calculation conservatively assumed that the exposed persons (receptors) would be at their most sensitive life stage (3rd trimester fetus to age 2) during this overlapping construction and operational period.

In its June 5, 2017 comment letter, the California Air Resources Board (CARB) suggested that the Port revise the Everport HRA to include an evaluation of the potential cancer risk starting in 2033, when operational PM10 and PM2.5 emissions from certain source categories would reach their peak. This memorandum investigates the potential cancer risks associated with a 2033 HRA start year.

Analysis Approach

Maximum cancer risks associated with a 2033 start year were estimated by scaling the maximum cancer risks in the DEIS/EIR (which correspond to a 2018 start year). The NEPA increment cancer risks at residential and sensitive receptors were selected for the scaling analysis because they represent the highest cancer risks estimated in the DEIS/EIR for the proposed Project. Tables B3-6 and B3-8 of the DEIS/EIR Appendix B3 show the following maximum NEPA increment (proposed Project minus NEPA baseline) cancer risks associated with a 2018 start year:

- Unmitigated proposed Project: 16.1 in a million at a residential receptor
- Unmitigated proposed Project: 11.7 in a million at a sensitive receptor
- Mitigated proposed Project: 9.0 in a million at a residential receptor
- Mitigated proposed Project: 7.0 in a million at a sensitive receptor

The contributions by source category to these four risk results are shown in Tables 1 through 4, below. The source contributions are provided by exposure sub-period, where the sub-periods correspond to receptor age ranges with common cancer risk calculation assumptions as set forth in OEHHA (2015). The sub-periods are defined as follows:

- Project Year 1-2 represents the first two years of project emissions and a receptor age of 3rd trimester fetus to age 2.

- Project Year 3-16 represents the 3rd through 16th year of project emissions and a receptor age of 2 to 16.

- Project Year 17-30 represents the 17th through 30th year of project emissions and a receptor age of 16 to 30.

The contributions to risk in Tables 1 through 4 show the absolute proposed Project risks prior to subtracting the NEPA baseline. The absolute proposed Project risks correspond to the third column in Tables B3-6 and B3-8 of the DEIS/EIR Appendix B3.

Table 1. Cancer Risk by Source Category at the Maximum Residential Receptor under NEPA - Proposed Project without Mitigation - 2018 HRA Start Year

Source Category	Exposure Sub-Period			Total Risk	Percent Contribution
	Project Year 1-2	Project Year 3-16	Project Year 17-30		
Construction					
Construction Offroad Equipment	8.81E-06	0	0	8.81E-06	14.9%
Construction Onroad Vehicles	2.09E-08	0	0	2.09E-08	0.04%
Construction Crane Delivery Ship	7.97E-08	0	0	7.97E-08	0.1%
Construction Harborcraft	1.32E-06	0	0	1.32E-06	2.2%
Construction Asphalt Paving	4.39E-09	0	0	4.39E-09	0.007%
Operation					
Ships in Transit	6.76E-06	8.57E-06	1.17E-06	1.65E-05	27.9%
Ships at Berth	2.63E-06	4.35E-06	6.75E-07	7.66E-06	12.9%
Ships at Anchorage	6.36E-09	1.01E-07	1.51E-08	1.23E-07	0.2%
Tugboats	9.89E-07	1.18E-06	1.36E-07	2.30E-06	3.9%
Trucks at Gates and On-Terminal	9.20E-07	3.26E-07	9.84E-09	1.26E-06	2.1%
Trucks Driving Off-Terminal	1.23E-06	7.24E-07	5.54E-08	2.01E-06	3.4%
Locomotives	1.17E-06	1.09E-06	9.02E-08	2.35E-06	4.0%
Cargo Handling Equipment	6.37E-06	9.04E-06	1.24E-06	1.67E-05	28.1%
Worker Vehicles	3.44E-08	3.91E-08	6.61E-09	8.01E-08	0.1%
Total	**3.03E-05**	**2.54E-05**	**3.40E-06**	**5.92E-05**	**100.0%**

Notes:
1. Risks by source category and exposure sub-period were calculated using HARP2.
2. Risks shown are for the absolute proposed Project, prior to subtracting the NEPA baseline risk.
3. Project Year 1-2 represents 2018-2019; Project Year 3-16 represents 2020-2033; Project Year 17-30 represents 2034-2047.

Table 2. Cancer Risk by Source Category at the Maximum Sensitive Receptor under NEPA - Proposed Project without Mitigation - 2018 HRA Start Year

Source Category	Exposure Sub-Period			Total Risk	Percent Contribution
	Project Year 1-2	Project Year 3-16	Project Year 17-30		
Construction					
Construction Offroad Equipment	6.08E-06	0	0	6.08E-06	13.3%
Construction Onroad Vehicles	1.57E-08	0	0	1.57E-08	0.03%
Construction Crane Delivery Ship	5.05E-08	0	0	5.05E-08	0.1%
Construction Harborcraft	1.23E-06	0	0	1.23E-06	2.7%
Construction Asphalt Paving	2.07E-09	0	0	2.07E-09	0.005%
Operation					
Ships in Transit	5.20E-06	6.59E-06	9.02E-07	1.27E-05	27.7%
Ships at Berth	1.55E-06	2.56E-06	3.97E-07	4.50E-06	9.8%
Ships at Anchorage	4.52E-09	7.19E-08	1.07E-08	8.72E-08	0.2%
Tugboats	9.95E-07	1.18E-06	1.37E-07	2.32E-06	5.1%
Trucks at Gates and On-Terminal	5.67E-07	1.97E-07	5.64E-09	7.69E-07	1.7%
Trucks Driving Off-Terminal	1.19E-06	7.00E-07	5.41E-08	1.95E-06	4.2%
Locomotives	1.09E-06	1.01E-06	8.42E-08	2.19E-06	4.8%
Cargo Handling Equipment	5.28E-06	7.50E-06	1.03E-06	1.38E-05	30.2%
Worker Vehicles	3.69E-08	4.09E-08	6.95E-09	8.47E-08	0.2%
Total	**2.33E-05**	**1.98E-05**	**2.63E-06**	**4.58E-05**	**100.0%**

Notes:

1. Risks by source category and exposure sub-period were calculated using HARP2.
2. Risks shown are for the absolute proposed Project, prior to subtracting the NEPA baseline risk.
3. Project Year 1-2 represents 2018-2019; Project Year 3-16 represents 2020-2033; Project Year 17-30 represents 2034-2047.

Table 3. Cancer Risk by Source Category at the Maximum Residential Receptor under NEPA - Proposed Project with Mitigation - 2018 HRA Start Year

Source Category	Exposure Sub-Period			Total Risk	Percent Contribution
	Project Year 1-2	Project Year 3-16	Project Year 17-30		
Construction					
Construction Offroad Equipment	8.08E-06	0	0	8.08E-06	14.8%
Construction Onroad Vehicles	1.93E-08	0	0	1.93E-08	0.0%
Construction Crane Delivery Ship	7.97E-08	0	0	7.97E-08	0.1%
Construction Harborcraft	6.59E-07	0	0	6.59E-07	1.2%
Construction Asphalt Paving	4.39E-09	0	0	4.39E-09	0.0%
Operation					
Ships in Transit	6.76E-06	8.57E-06	1.17E-06	1.65E-05	30.2%
Ships at Berth	2.36E-06	1.97E-06	2.76E-07	4.60E-06	8.4%
Ships at Anchorage	6.36E-09	1.01E-07	1.51E-08	1.23E-07	0.2%
Tugboats	9.89E-07	1.18E-06	1.36E-07	2.30E-06	4.2%
Trucks at Gates and On-Terminal	9.20E-07	3.26E-07	9.84E-09	1.26E-06	2.3%
Trucks Driving Off-Terminal	1.23E-06	7.24E-07	5.54E-08	2.01E-06	3.7%
Locomotives	1.17E-06	1.09E-06	9.02E-08	2.35E-06	4.3%
Cargo Handling Equipment	6.37E-06	9.04E-06	1.24E-06	1.67E-05	30.4%
Worker Vehicles	3.44E-08	3.91E-08	6.61E-09	8.01E-08	0.1%
Total	**2.87E-05**	**2.30E-05**	**3.00E-06**	**5.47E-05**	**100.0%**

Notes:

1. Risks by source category and exposure sub-period were estimated by scaling from the unmitigated risks by the ratio of mitigated emissions/unmitigated emissions.
2. Risks shown are for the absolute proposed Project, prior to subtracting the NEPA baseline risk.
3. Project Year 1-2 represents 2018-2019; Project Year 3-16 represents 2020-2033; Project Year 17-30 represents 2034-2047.

Table 4. Cancer Risk by Source Category at the Maximum Sensitive Receptor under NEPA - Proposed Project with Mitigation - 2018 HRA Start Year

Source Category	Exposure Sub-Period			Total Risk	Percent Contribution
	Project Year 1-2	Project Year 3-16	Project Year 17-30		
Construction					
Construction Offroad Equipment	5.58E-06	0	0	5.58E-06	13.0%
Construction Onroad Vehicles	1.45E-08	0	0	1.45E-08	0.0%
Construction Crane Delivery Ship	5.05E-08	0	0	5.05E-08	0.1%
Construction Harborcraft	6.15E-07	0	0	6.15E-07	1.4%
Construction Asphalt Paving	2.07E-09	0	0	2.07E-09	0.0%
Operation					
Ships in Transit	5.20E-06	6.59E-06	9.02E-07	1.27E-05	29.6%
Ships at Berth	1.39E-06	1.16E-06	1.62E-07	2.71E-06	6.3%
Ships at Anchorage	4.52E-09	7.19E-08	1.07E-08	8.72E-08	0.2%
Tugboats	9.95E-07	1.18E-06	1.37E-07	2.32E-06	5.4%
Trucks at Gates and On-Terminal	5.67E-07	1.97E-07	5.64E-09	7.69E-07	1.8%
Trucks Driving Off-Terminal	1.19E-06	7.00E-07	5.41E-08	1.95E-06	4.5%
Locomotives	1.09E-06	1.01E-06	8.42E-08	2.19E-06	5.1%
Cargo Handling Equipment	5.28E-06	7.50E-06	1.03E-06	1.38E-05	32.2%
Worker Vehicles	3.69E-08	4.09E-08	6.95E-09	8.47E-08	0.2%
Total	**2.20E-05**	**1.84E-05**	**2.39E-06**	**4.28E-05**	**100.0%**

Notes:

1. Risks by source category and exposure sub-period were estimated by scaling from the unmitigated risks by the ratio of mitigated emissions/unmitigated emissions.
2. Risks shown are for the absolute proposed Project, prior to subtracting the NEPA baseline risk.
3. Project Year 1-2 represents 2018-2019; Project Year 3-16 represents 2020-2033; Project Year 17-30 represents 2034-2047.

Table 5 shows the scaling factors that were applied to the source contributions in Tables 1 through 4 to estimate the risks for the 2033 start year. The scaling factors were derived from the ratio of proposed Project-related PM10 exhaust emissions during the exposure sub-periods within the 2033-2062 exposure duration relative to the 2018-2047 exposure duration. The ratio of PM10 emissions is a good surrogate for the ratio of cancer risk because almost all PM10 is diesel particulate matter (DPM) exhaust for the key sources in the HRA, and DPM is responsible for nearly all of the cancer risk.

Table 5. Scaling Factors by Source Category to Convert from a 2018 HRA Start to a 2033 HRA Start

Source Category	Unmitigated Project			Mitigated Project		
	Project Year 1-2	Project Year 3-16	Project Year 17-30	Project Year 1-2	Project Year 3-16	Project Year 17-30
Construction						
Construction Offroad Equipment	0	0	0	0	0	0
Construction Onroad Vehicles	0	0	0	0	0	0
Construction Crane Delivery Ship	0	0	0	0	0	0
Construction Harborcraft	0	0	0	0	0	0
Construction Asphalt Paving	0	0	0	0	0	0
Operation						
Ships in Transit	1.47	1.22	1.00	1.47	1.22	1.00
Ships at Berth	2.43	1.24	1.00	1.11	1.12	1.00
Ships at Anchorage	21.05	1.28	1.00	21.05	1.28	1.00
Tugboats	1.44	1.03	0.96	1.44	1.03	0.96
Trucks at Gates and On-Terminal	0.03	0.11	1.00	0.03	0.11	1.00
Trucks Driving Off-Terminal	0.30	0.51	0.98	0.30	0.51	0.98
Locomotives	0.90	0.71	0.92	0.90	0.71	0.92
Cargo Handling Equipment	1.50	1.18	1.00	1.50	1.18	1.00
Worker Vehicles	1.00	1.00	1.00	1.00	1.00	1.00

Notes:

1. Scaling factors were derived from the ratio of PM10 exhaust emissions from a 2033 start relative to a 2018 start during each of the indicated exposure sub-periods.

2. Construction scaling factors are zero because there would be no construction during an exposure period that starts in 2033.

Analysis Results

Tables 6 through 9 show the estimated proposed Project cancer risks associated with a 2033 HRA start year for residential and sensitive receptors, without and with mitigation. The risks were obtained by multiplying the risk contributions in Tables 1 through 4 by the scaling factors in Table 5. The risks in Tables 6 through 9 are the absolute proposed Project risks prior to subtracting the NEPA baseline.

The bottom two rows of Tables 6 through 9 show how the cancer risks would change for a 2033 start year relative to a 2018 start year:

- Table 6 shows that, without mitigation, the estimated risk at the maximum residential receptor would increase by approximately 2.3 in a million (3.9 percent of proposed Project absolute) with a 2033 start year. Therefore, the estimated NEPA increment cancer risk would increase from 16.1 to approximately 18.4 in a million. Both results would exceed the significance threshold of 10 in a million.

- Table 7 shows that, without mitigation, the estimated risk at the maximum sensitive receptor would increase by approximately 1.7 in a million (3.6 percent of proposed Project absolute)

with a 2033 start year. Therefore, the estimated NEPA increment cancer risk would increase from 11.7 to approximately 13.4 in a million. Both results would exceed the significance threshold of 10 in a million.

- Table 8 shows that, with mitigation, the estimated risk at the maximum residential receptor would decrease by approximately 0.6 in a million (1.1 percent of proposed Project absolute) with a 2033 start year. Therefore, the estimated NEPA increment cancer risk would decrease from 9.0 to approximately 8.4 in a million. Neither result would exceed the significance threshold of 10 in a million.

- Table 9 shows that, with mitigation, the estimated risk at the maximum sensitive receptor would increase by approximately 0.2 in a million (0.6 percent of proposed Project absolute) with a 2033 start year. Therefore, the estimated NEPA increment cancer risk would increase from 7.0 to approximately 7.2 in a million. Neither result would exceed the significance threshold of 10 in a million.

In summary, the scaling analysis described in this memorandum predicts that the maximum cancer risks for the proposed Project would differ by a range of -0.6 to +2.3 in a million at the maximum NEPA increment receptors, depending on the receptor type and whether mitigation is applied, for a 2033 start year relative to a 2018 start year. None of the four scenarios analyzed in this memorandum would change its significance finding with a 2033 HRA start year.

Table 6. Estimated Cancer Risk by Source Category at the Maximum Residential Receptor under NEPA - Proposed Project without Mitigation - 2033 HRA Start Year

Source Category	Exposure Sub-Period			Total Risk	Percent Contribution
	Project Year 1-2	Project Year 3-16	Project Year 17-30		
Construction					
Construction Offroad Equipment	0	0	0	0	0.0%
Construction Onroad Vehicles	0	0	0	0	0.0%
Construction Crane Delivery Ship	0	0	0	0	0.0%
Construction Harborcraft	0	0	0	0	0.0%
Construction Asphalt Paving	0	0	0	0	0.0%
Operation					
Ships in Transit	9.97E-06	1.05E-05	1.17E-06	2.16E-05	35.2%
Ships at Berth	6.39E-06	5.40E-06	6.75E-07	1.25E-05	20.3%
Ships at Anchorage	1.34E-07	1.29E-07	1.51E-08	2.78E-07	0.5%
Tugboats	1.43E-06	1.21E-06	1.30E-07	2.76E-06	4.5%
Trucks at Gates and On-Terminal	2.81E-08	3.68E-08	9.84E-09	7.47E-08	0.1%
Trucks Driving Off-Terminal	3.69E-07	3.72E-07	5.44E-08	7.95E-07	1.3%
Locomotives	1.06E-06	7.73E-07	8.30E-08	1.91E-06	3.1%
Cargo Handling Equipment	9.56E-06	1.07E-05	1.24E-06	2.15E-05	35.0%
Worker Vehicles	3.44E-08	3.91E-08	6.61E-09	8.01E-08	0.1%
Total	**2.90E-05**	**2.91E-05**	**3.39E-06**	**6.15E-05**	**100%**
Change Relative to 2018 HRA Start				**2.32E-06**	
Change Relative to 2018 HRA Start (%)				**3.9%**	

Notes:

1. Risks associated with a 2033 start were estimated by applying the scaling factors (Table 5) to the risks associated with a 2018 start (Table 1).
2. Project Year 1-2 represents 2033-2034; Project Year 3-16 represents 2035-2048; Project Year 17-30 represents 2049-2062.
3. Risks shown are for the absolute proposed Project, prior to subtracting the NEPA baseline risk.

Table 7. Estimated Cancer Risk by Source Category at the Maximum Sensitive Receptor under NEPA - Proposed Project without Mitigation - 2033 HRA Start Year

Source Category	Exposure Sub-Period			Total Risk	Percent Contribution
	Project Year 1-2	Project Year 3-16	Project Year 17-30		
Construction					
Construction Offroad Equipment	0	0	0	0	0.0%
Construction Onroad Vehicles	0	0	0	0	0.0%
Construction Crane Delivery Ship	0	0	0	0	0.0%
Construction Harborcraft	0	0	0	0	0.0%
Construction Asphalt Paving	0	0	0	0	0.0%
Operation					
Ships in Transit	7.67E-06	8.05E-06	9.02E-07	1.66E-05	35.0%
Ships at Berth	3.76E-06	3.17E-06	3.97E-07	7.33E-06	15.5%
Ships at Anchorage	9.52E-08	9.20E-08	1.07E-08	1.98E-07	0.4%
Tugboats	1.43E-06	1.21E-06	1.31E-07	2.78E-06	5.9%
Trucks at Gates and On-Terminal	1.73E-08	2.22E-08	5.64E-09	4.52E-08	0.1%
Trucks Driving Off-Terminal	3.58E-07	3.59E-07	5.31E-08	7.71E-07	1.6%
Locomotives	9.84E-07	7.20E-07	7.75E-08	1.78E-06	3.8%
Cargo Handling Equipment	7.92E-06	8.87E-06	1.03E-06	1.78E-05	37.6%
Worker Vehicles	3.69E-08	4.09E-08	6.95E-09	8.47E-08	0.2%
Total	**2.23E-05**	**2.25E-05**	**2.61E-06**	**4.74E-05**	**100%**
Change Relative to 2018 HRA Start				**1.65E-06**	
Change Relative to 2018 HRA Start (%)				**3.6%**	

Notes:

1. Risks associated with a 2033 start were estimated by applying the scaling factors (Table 5) to the risks associated with a 2018 start (Table 2).
2. Project Year 1-2 represents 2033-2034; Project Year 3-16 represents 2035-2048; Project Year 17-30 represents 2049-2062.
3. Risks shown are for the absolute proposed Project, prior to subtracting the NEPA baseline risk.

Table 8. Estimated Cancer Risk by Source Category at the Maximum Residential Receptor under NEPA - Proposed Project with Mitigation - 2033 HRA Start Year

Source Category	Exposure Sub-Period			Total Risk	Percent Contribution
	Project Year 1-2	Project Year 3-16	Project Year 17-30		
Construction					
Construction Offroad Equipment	0	0	0	0	0.0%
Construction Onroad Vehicles	0	0	0	0	0.0%
Construction Crane Delivery Ship	0	0	0	0	0.0%
Construction Harborcraft	0	0	0	0	0.0%
Construction Asphalt Paving	0	0	0	0	0.0%
Operation					
Ships in Transit	9.97E-06	1.05E-05	1.17E-06	2.16E-05	39.9%
Ships at Berth	2.62E-06	2.21E-06	2.76E-07	5.10E-06	9.4%
Ships at Anchorage	1.34E-07	1.29E-07	1.51E-08	2.78E-07	0.5%
Tugboats	1.43E-06	1.21E-06	1.30E-07	2.76E-06	5.1%
Trucks at Gates and On-Terminal	2.81E-08	3.68E-08	9.84E-09	7.47E-08	0.1%
Trucks Driving Off-Terminal	3.69E-07	3.72E-07	5.44E-08	7.95E-07	1.5%
Locomotives	1.06E-06	7.73E-07	8.30E-08	1.91E-06	3.5%
Cargo Handling Equipment	9.56E-06	1.07E-05	1.24E-06	2.15E-05	39.7%
Worker Vehicles	3.44E-08	3.91E-08	6.61E-09	8.01E-08	0.1%
Total	**2.52E-05**	**2.59E-05**	**2.99E-06**	**5.41E-05**	**100%**
Change Relative to 2018 HRA Start				**-5.93E-07**	
Change Relative to 2018 HRA Start (%)				**-1.1%**	

Notes:

1. Risks associated with a 2033 start were estimated by applying the scaling factors (Table 5) to the risks associated with a 2018 start (Table 3).
2. Project Year 1-2 represents 2033-2034; Project Year 3-16 represents 2035-2048; Project Year 17-30 represents 2049-2062.
3. Risks shown are for the absolute proposed Project, prior to subtracting the NEPA baseline risk.

Table 9. Estimated Cancer Risk by Source Category at the Maximum Sensitive Receptor under NEPA - Proposed Project with Mitigation - 2033 HRA Start Year

Source Category	Exposure Sub-Period			Total Risk	Percent Contribution
	Project Year 1-2	Project Year 3-16	Project Year 17-30		
Construction					
Construction Offroad Equipment	0	0	0	0	0.0%
Construction Onroad Vehicles	0	0	0	0	0.0%
Construction Crane Delivery Ship	0	0	0	0	0.0%
Construction Harborcraft	0	0	0	0	0.0%
Construction Asphalt Paving	0	0	0	0	0.0%
Operation					
Ships in Transit	7.67E-06	8.05E-06	9.02E-07	1.66E-05	38.6%
Ships at Berth	1.54E-06	1.30E-06	1.62E-07	3.00E-06	7.0%
Ships at Anchorage	9.52E-08	9.20E-08	1.07E-08	1.98E-07	0.5%
Tugboats	1.43E-06	1.21E-06	1.31E-07	2.78E-06	6.4%
Trucks at Gates and On-Terminal	1.73E-08	2.22E-08	5.64E-09	4.52E-08	0.1%
Trucks Driving Off-Terminal	3.58E-07	3.59E-07	5.31E-08	7.71E-07	1.8%
Locomotives	9.84E-07	7.20E-07	7.75E-08	1.78E-06	4.1%
Cargo Handling Equipment	7.92E-06	8.87E-06	1.03E-06	1.78E-05	41.3%
Worker Vehicles	3.69E-08	4.09E-08	6.95E-09	8.47E-08	0.2%
Total	**2.01E-05**	**2.07E-05**	**2.38E-06**	**4.31E-05**	**100%**
Change Relative to 2018 HRA Start				**2.47E-07**	
Change Relative to 2018 HRA Start (%)				**0.6%**	

Notes:

1. Risks associated with a 2033 start were estimated by applying the scaling factors (Table 5) to the risks associated with a 2018 start (Table 4).
2. Project Year 1-2 represents 2033-2034; Project Year 3-16 represents 2035-2048; Project Year 17-30 represents 2049-2062.
3. Risks shown are for the absolute proposed Project, prior to subtracting the NEPA baseline risk.

References

OEHHA, 2015. *Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments*. February.

DRAFT FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS

Document considered draft until Board review and approval

Berths 226-236 [Everport] Container Terminal Improvements Project Environmental Impact Report

October 2017

Prepared by:

Los Angeles Harbor Department
Environmental Management Division
425 S. Palos Verdes Street
San Pedro, CA 90731

THE PORT OF LOS ANGELES

With assistance from:

CDM Smith

US Army Corps of Engineers

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Table of Contents

Chapter 1

CEQA Findings of Fact and Statement of Overriding Considerations

1.1 Introduction

These Findings of Fact have been prepared by the Los Angeles Harbor Department (LAHD, or Port) as the Lead Agency pursuant to Section 21081 of the Public Resources Code (PRC) and Section 15091 of the State California Environmental Quality Act (CEQA) Guidelines to support a decision to adopt Alternative 5 (referred to herein as the Recommended Alternative) considered as part of the Environmental Impact Statement and Environmental Impact Report (EIS/EIR) prepared for the Berths 226-236 [Everport] Container Terminal Improvements Project. Section 21081 of the Public Resources Code and Section 15091 of the CEQA Guidelines provide that no public agency shall approve or carry out a project for which an Environmental Impact Report (EIR) has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effects as identified in the Final EIR.
2. Such changes or alterations are the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provisions of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Additionally, the Lead Agency must not approve a project that will have a significant effect on the environment unless it finds that specific overriding economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of the project outweigh the unavoidable adverse environmental effects, thereby rendering them "acceptable" to the decision maker. (PRC Section 21081(b); 14 California Code of Regulations [CCR] Section 15093). The Board of Harbor Commissioners (Board) adopts the Statement of Overriding Considerations set forth below, which identifies the specific overriding economic, legal, social, technological, or other benefits of the project that outweigh the significant environmental impacts identified in the Final EIR.

The Recommended Alternative includes project elements that will require federal permits from the U.S. Army Corps of Engineers (USACE). As such, an Environmental Impact Statement

(EIS) was also prepared. The USACE and LAHD prepared a joint EIS/EIR in the interest of efficiency and to avoid duplication of effort. The USACE will consider certification and approval of the EIS separate from the Board of Harbor Commissioner's (Board's) consideration of the EIR. The Findings of Fact are based on substantial evidence, including the evaluations and impact determinations made in the EIR prepared pursuant to CEQA; however, because a joint EIS/EIR was prepared, references to both the Draft and Final EIS/EIR are made throughout this document.

Chapter 2
Recommend Alternative Overview

2.1 Introduction

This section describes the alternative that is recommended by staff for adoption (hereafter referred to as the 'Recommended Alternative') as analyzed under Alternative 5 in the Berths 226-236 [Everport] Container Terminal Improvements Project EIR/EIS. The EIR/EIS fully analyzed the reasonably foreseeable and potentially significant adverse environmental effects associated with construction and operation of the Recommended Alternative (Alternative 5).

2.1.1 Project Purpose

The LAHD operates the Port under the legal mandates of the Port of Los Angeles Tidelands Trust (Los Angeles City Charter, Article VI, Section 601) and the California Coastal Act (PRC Division 20 Section 30700 *et seq*.), which identify the Port and its facilities as a primary economic and coastal resource of the State of California and an essential element of the national maritime industry for the promotion of commerce, navigation, fisheries, and Harbor operations. Activities should be water dependent and the LAHD must give highest priority to navigation, shipping, and necessary support and access facilities to accommodate the demands of foreign and domestic waterborne commerce. The LAHD is chartered to develop and operate the Port to benefit maritime uses, and it functions as a landlord by leasing Port properties to more than 300 tenants.

As explained in the EIS/EIR, the purpose of the Recommended Alternative is to optimize marine shipping and commerce by upgrading the Everport Container Terminal's infrastructure in, over, and under the water while increasing and improving terminal backlands to accommodate the projected throughput and fleet mix of larger container ships [up to 16,000 twenty-equivalent units (TEUs)] that are anticipated to call at the Everport Container Terminal through 2038.

The Recommended Alternative is needed for several reasons; however, it is primarily related to an increase in the size of vessels that will be entering the fleet mix throughout the life of the project. Forecasts show that vessel fleets calling at the Port of Los Angeles and the Everport Container Terminal would include larger vessels (up to 16,000 TEUs), creating a need to improve Port facilities to accommodate larger vessels. The existing berths that serve the Everport Container Terminal are not deep enough to accommodate the projected fleet mix through 2038 (the existing berths can only accommodate up to 8,000 TEU vessels). These berths would be upgraded (deepened) as part of the Recommended Alternative. In addition to existing berth depth restrictions, additional cranes are needed to efficiently load and unload the larger container ships. Finally, additional container yard backlands are needed to accommodate future operations and the projected Port-wide throughput (The Tioga Group, 2009). The final

project component would be to increase Everport's Terminal Island Container Transfer Facility (TICTF) by one rail track to allow additional cargo to be transported offsite by rail rather than via heavy-duty truck.

2.1.2 CEQA Objectives

CEQA Guidelines (Section 15124[b]) require that the project description contain a statement of objectives, including the underlying purpose of the Recommended Alternative. The underlying fundamental purpose and project objective is to optimize the container-handling efficiency and capacity of the Port to accommodate the projected fleet mix of larger container vessels (up to 16,000 TEUs) that are anticipated to call at the Everport Container Terminal (i.e., Project site) through 2038. The fundamental purpose, in turn, gives rise to the following additional project objectives:

- Optimize the use of existing land at the Everport Container Terminal and associated waterways in a manner that is consistent with the LAHD's public trust obligations;
- Provide sufficient depth along Berths 226-229 [-53 mean lower low water (MLLW) plus two feet of overdepth tolerance for a total depth of -55 feet MLLW] and Berths 230-232 (-47 MLLW plus two feet of overdepth tolerance for a total depth of -49 feet MLLW) to ensure the terminal's ability to accommodate up to 16,000 TEU vessels anticipated to call at the terminal;
- Provide new cranes and raise existing cranes to efficiently service the larger container ships anticipated to call at the terminal;
- Improve the container terminal and container handling facilities to accommodate more efficient loading/unloading of the larger and increased number of ships anticipated to call at the terminal;
- Improve the container terminal backland capacity;
- Maximize container land use and operations at the Everport Container Terminal consistent with the Port Master Plan; and
- Promote the long-term development and growth of the Port.

2.1.3 Project Description (Recommended Alternative)

This section describes the Recommended Alternative for the Berths 226-236 [Everport] Container Terminal Improvements Project EIR. The EIR analyzes the construction and operation of the Recommended Alternative under Alternative 5 in the EIS/EIR. The Project site is located at 389 Terminal Way on Terminal Island in the Port of Los Angeles within the Port of Los Angeles Community Plan area of the City, and within the County of Los Angeles, California.

The existing 205-acre container terminal at the Project site includes 180 acres under lease and an existing space assignment for 25 acres of backland area behind Berths 232-236. The Recommended Alternative would increase the existing terminal size from 205 acres to approximately 229 acres by incorporating an additional 23.5 acres (consisting of a 1.5-acre parcel and a 22-acre parcel) into the lease. Below is a summary of the improvements that would occur:

- Dredging (including installation of king piles and approximately 1,400 linear feet of sheet piling to stabilize the wharf) at Berths 226-229 to a design depth of -53 feet MLLW plus

two feet of overdepth tolerance (for a total depth of -55 feet MLLW) to accommodate larger ships (the existing design depth is -45 feet MLLW);

- Dredging (including installation of approximately 1,400 linear feet of sheet piling to stabilize the wharf) at Berths 230-232 to a design depth of -47 feet MLLW plus two feet of overdepth tolerance (for a total depth of -49 feet MLLW) to accommodate larger ships (the existing design depth is -45 feet MLLW);
- Disposal of approximately 38,000 cubic yards of dredged material (30,000 cubic yards from Berths 226-229 and 8,000 cubic yards from Berths 230-232) at an ocean disposal site (i.e., LA-2), an approved upland disposal facility, or a combination of the above;
- Addition of five new 100-foot gauge A-frame over-water gantry (wharf) cranes manufactured by Shanghai Zhenhua Heavy Industry Co., Ltd. (ZPMC), or equivalent. These additional cranes would be installed upon existing crane rails at Berths 226-229 to accommodate larger ships at the proposed deeper berths. Addition of the new cranes would require infrastructure improvements (such as cable and electrical upgrades);
- The raising of up to five of the existing operational cranes in order to accommodate larger vessels.
- Addition of five AMP vaults (throughout wharf area adjacent to Berths 226 to 232) and associated infrastructure (e.g., electrical conduit and wires);
- Installation of three-foot spacers between the wharf and existing wharf fenders to provide better clearance between the berthed vessels and the new king and sheet piles;
- Development of approximately 1.5 acres of vacant land as new backlands;
- Development of approximately 22 acres as new backlands and modified inbound and outbound gates associated with the relocation of the main gate. The development of the 22 acres would require closure (vacation) of streets within this backlands expansion area (see next bullet) and demolition of existing structures (with the exception of the existing electrical substation);
- Closure of portions of Terminal Way, Barracuda Street, Tuna Street, and Ways Street within the Project site and rerouting of Terminal Way traffic to Cannery Street;
- Improvements to Cannery Street, including: street realignment, pavement improvements, street widening, striping, traffic lighting and signals, drainage, and sidewalk improvements;
- Infrastructure to support 23.5 acres (1.5 + 22 acres) of new backlands (such as lighting, paving, and drainage improvements);
- Addition of one rail track at the TICTF to increase the capacity of the Everport portion of the on-dock railyard;
- Amendment of the lease to add approximately 48.5 acres of terminal backlands comprised of approximately 25 acres of existing developed terminal backlands currently under space assignment, and the 23.5 acres (1.5 plus 22 acres) of new backland area, for a total terminal acreage of approximately 229 acres; and,
- Extension of the facility lease by 10 years for continued operations from the current end date of 2028 to 2038.

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Chapter 3
CEQA Findings

3.1 Environmental Impacts of the Recommended Alternative

The Findings of Fact are based on information contained in the Draft EIS/EIR and the Final EIS/EIR for the Recommended Alternative (analyzed in the EIS/EIR as Alternative 5), as well as information contained within the administrative record. The administrative record includes, but is not limited to, the proposed Project application, project staff reports, reports and studies referenced in the Draft EIS/EIR and Final EIS/EIR, project public hearing records, public notices, written comments on the project and responses to those comments, proposed decisions and findings on the Recommended Alternative, and other documents relating to the agency decision on the project. When making CEQA findings required by Public Resources Code Section 21081(a), a public agency shall specify the location and custodian of the documents or other materials, which constitute the record of proceedings upon which its decision is based. These records are in the care of the Director of Environmental Management, Los Angeles Harbor Department, 222 West 6th Street, San Pedro, California 90731.

The Draft EIS/EIR addresses the Recommended Alternative's potential effects on the environment, and was circulated for public review and comment pursuant to the State CEQA Guidelines for a period of 45 days. Comments were received from a variety of public agencies, organizations, and individuals. The Final EIS/EIR contains copies of all comments and recommendations received on the Draft EIS/EIR, a list of persons, organizations and public agencies commenting on the Draft EIS/EIR, responses to comments received during the public review, and changes to the Draft EIS/EIR. This section provides a summary of the environmental effects of the Recommended Alternative that are discussed in the EIS/EIR and provides written findings for each of the significant effects which are accompanied by a brief explanation of the rationale for each finding.

3.1.1 Environmental Impacts Found to Be Significant and Unavoidable

The EIS/EIR concludes that some, but not all, impacts of the Recommended Alternative in the following environmental resource areas would remain significant and unavoidable despite incorporation of all feasible mitigation:

- Air Quality and Meteorology
- Biological Resources
- Cultural Resources

- Greenhouse Gas Emissions

The Board hereby finds that, despite the imposition of all feasible mitigation measures, the following environmental impacts of the Recommended Alternative are significant and unavoidable. Table 1 lists the required mitigation measures (MM), lease measures (LM), and standard conditions of approval (SC) and potential remaining impacts after mitigation.

Table 1: Significant and Unavoidable Adverse Environmental Impacts for the Recommended Alternative (Alternative 5)

Environmental Impact	Impact Determination	Mitigation Measures	Impacts after Mitigation
Air Quality and Meteorology			
AQ-1: The Recommended Alternative would result in construction-related emissions that exceed an SCAQMD threshold of significance.	Construction would be significant for NO_X in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for NO_X in 2019.	**MM AQ-1:** Harbor Craft Used During Construction. **MM AQ-2:** On-Road Trucks Used during Construction. **MM AQ-3:** Non-Road Construction Equipment. **MM AQ-4:** Cargo Ships Used During Construction. **MM AQ-5:** General Mitigation Measure.	Construction would be significant and unavoidable for NO_X in 2018 and 2019 and VOC in 2019. Overlapping construction and operations would be significant and unavoidable for NO_X in 2019.
AQ-2: Recommended Alternative construction would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance.	Maximum off-site ambient air pollutant concentrations would be significant for NO_2 (federal and state1-hour average). Overlapping construction and operations would be significant for PM_{10} (24-hour and annual average).	**MM AQ-1** through **MM AQ-5**	Maximum off-site ambient air pollutant concentrations would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for PM_{10} (24-hour and annual average).
AQ-3: The Recommended Alternative would result in operational emissions that exceed an SCAQMD threshold of significance.	Operations would be significant for NO_X in 2019 and CO and VOC in 2033 and 2038.	**MM AQ-6:** Vessel Speed Reduction Program (VSRP). **MM AQ-7:** Alternative Maritime Power (AMP). **LM AQ-1:**	Operations would be significant and unavoidable for CO and VOC in 2033 and 2038.

Table 1: Significant and Unavoidable Adverse Environmental Impacts for the Recommended Alternative (Alternative 5)

Environmental Impact	Impact Determination	Mitigation Measures	Impacts after Mitigation
		Replacement of Equipment and Review of New Technology and Regulations. **LM AQ-2:** Priority Access System.	
AQ-4: Recommended Alternative operations would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance.	Operations would be significant for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).	**MM AQ-6** and **MM AQ-7**	Operations would be significant and unavoidable for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average).
Biological Resources			
BIO-3: The Recommended Alternative has the potential to introduce noise, light, or nonnative species into the Harbor that could substantially disrupt local biological communities.	Potentially significant	No mitigation is available.	Significant and unavoidable.
Cultural Resources			
CR-1: The Recommended Alternative would have a significant impact on built environment historical resources.	Potentially significant	**MM CR-1:** Historic Resource Recordation.	Significant and unavoidable
CR-2: The Recommended Alternative would cause a substantial adverse change in the significance of an archaeological or ethnographic resource.	Potentially significant	**MM CR-2:** Completion of Phase I Cultural Resource Investigation. **MM CR-3:** Pre-construction Worker Training. **SC CR-1**: Stop Work if Prehistoric and/or Archaeological Resources are Encountered.	Significant and unavoidable

Table 1: Significant and Unavoidable Adverse Environmental Impacts for the Recommended Alternative (Alternative 5)

Environmental Impact	Impact Determination	Mitigation Measures	Impacts after Mitigation
Greenhouse Gas Emissions			
GHG-1: The Recommended Alternative would generate GHG emissions, either directly or indirectly that would exceed the SCAQMD 10,000 mty CO_2e threshold.	Potentially significant	**MM AQ-2.** On-road Trucks Used during Construction. **MM AQ-6**. VSRP. **MM AQ-7.** AMP. **MM GHG-1**. LED Lighting. **MM GHG-2.** Solar Electricity. **LM GHG-1.** GHG Credit Fund. **LM AQ-1:** Replacement of Equipment and Review of New Technology and Regulations. **LM AQ-2:** Priority Access System.	Significant and unavoidable

3.1.2 Environmental Impacts Found to Be Less than Significant after Mitigation

The EIS/EIR concludes that some, but not all, significant impacts of the Recommended Alternative in the following environmental resource areas would be less than significant after mitigation:

- Biological Resources
- Noise

In addition, the EIS/EIR concludes that some, but not all, impacts of the Recommended Alternative in the following resource area was found to be less than significant prior to mitigation. However, mitigation measures and/or standard conditions of approval were still identified for the less-than-significant impacts in the following areas, to further ensure that impacts remain minimal.

- Biological Resources
- Cultural Resources

The Board hereby finds that the following environmental impacts of the Recommended Alternative are less than significant after implementation of mitigation measures, as summarized in Table 2, which also lists the mitigation measures applied and the impacts after mitigation. Mitigation measures and/or standard conditions of approval were also identified where impacts would be less than significant prior to mitigation but are applied to ensure that impacts would be minimal.

Table 2: Significant Environmental Impacts that Can be Mitigated for the Recommended Alternative (Alternative 5)

Environmental Impact	Impact Determination	Mitigation Measures	Impacts after Mitigation
Biological Resources			
BIO-1: The Recommended Alternative could cause a loss of individuals or habitat of a state- or federally listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern or the loss of federally listed critical habitat.	Potentially Significant	**MM BIO-1:** Protect Marine Mammals. **MM AQ-6:** VSRP.	Less than significant
Cultural Resources			
CR-3: The Recommended Alternative would not result in the permanent loss of, or loss of access to, a significant paleontological resource.	Less than significant	No mitigation is required. **SC CR-2**: Unanticipated Discovery of Paleontological Resources.	Less than significant
Noise			
NOI-1: Construction of the Recommended Alternative could result in daytime construction activities lasting more than 10 days in a three-month period that would exceed existing ambient exterior noise levels by 5 dBA or more at noise-sensitive receptors.	Significant impact	**MM NOI-1:** Noise Reduction during Pile Driving. **MM NOI-2**: Utilize Temporary Noise Attenuation Curtain Adjacent to Pile Driving Equipment.	Less than significant

3.1.3 Environmental Impacts Found to Be Less than Significant

The EIS/EIR concludes that all impacts of the Recommended Alternative in the following environmental resource areas would be less than significant.

- Aesthetics and Visual Resources
- Ground Transportation
- Groundwater and Soils
- Hazards and Hazardous Materials
- Marine Transportation
- Water Quality, Sediments, and Oceanography

In addition, the EIS/EIR concludes that some, but not all, impacts of the Recommended Alternative in the following environmental resource areas would be less than significant.

- Air Quality and Meteorology
- Biological Resources
- Noise

The Board finds that the following environmental impacts of the Recommended Alternative are less than significant and hereby makes the same determination based on the conclusions in the Final EIS/EIR, as summarized in Table 3. No mitigation measures are required for impacts that are less than significant (14 CCR Section 15126.4(3)(a)).

Table 3: Less Than Significant Environmental Impacts for the Recommended Alternative (Alternative 5)

Environmental Impact	Impact Determination	Mitigation Measures	Impacts after Mitigation
Aesthetics and Visual Resources			
AES-1: Construction and operation of the Recommended Alternative would not result in a substantial adverse effect on a scenic vista.	Less than significant	No mitigation is required	Less than significant
AES-2: Construction and operation of the Recommended Alternative would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a state scenic highway.	Less than significant	No mitigation is required	Less than significant
AES-3: Construction and operation of the Recommended Alternative would not substantially degrade the existing visual character or quality of the site and its surroundings.	Less than significant	No mitigation is required	Less than significant
AES-4: Construction and operation of the Recommended Alternative would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.	Less than significant	No mitigation is required	Less than significant
Air Quality and Meteorology			
AQ-5: The Recommended Alternative would not generate on-road traffic that would contribute to an exceedance of the 1-hour or 8-hour CO standards.	Less than significant	No mitigation is required	Less than significant
AQ-6: The Recommended Alternative would not create an objectionable odor at the nearest sensitive receptor.	Less than significant	No mitigation is required	Less than significant

Table 3: Less Than Significant Environmental Impacts for the Recommended Alternative (Alternative 5)

Environmental Impact	Impact Determination	Mitigation Measures	Impacts after Mitigation
AQ-7: The Recommended Alternative would expose receptors to significant levels of TACs.	Less than significant	No mitigation is required	Less than significant
AQ-8: The Recommended Alternative would not conflict with or obstruct implementation of an applicable AQMP.	Less than significant	No mitigation is required	Less than significant
Biological Resources			
BIO-2: The Recommended Alternative would not interfere with wildlife movement that could diminish the chances for long-term survival of a species.	Less than significant.	No mitigation is required.	Less than significant.
BIO-4: The Recommended Alternative would not result in a permanent loss of marine habitat.	Less than significant	No mitigation is required	Less than significant
Ground Transportation			
TRANS-1: The Recommended Alternative would not result in a short-term, temporary increase in truck and auto traffic.	Less than significant	No mitigation is required	Less than significant
TRANS-2: Long-term vehicular traffic associated with the Recommended Alternative would not significantly impact volume/capacity ratios or level of service.	Less than significant	No mitigation is required	Less than significant
TRANS-3: An increase in on-site employees due to Recommended Alternative operations would not significantly increase public transit use.	Less than significant	No mitigation is required	Less than significant
TRANS-4: Recommended Alternative operations would not significantly increase freeway congestion.	Less than significant	No mitigation is required	Less than significant
TRANS-5 (For Informational Purposes): Recommended Alternative operations would not cause a significant impact in vehicular delay at at-grade railroad crossings within the	Less than significant	No mitigation is required	Less than significant

Table 3: Less Than Significant Environmental Impacts for the Recommended Alternative (Alternative 5)

Environmental Impact	Impact Determination	Mitigation Measures	Impacts after Mitigation
proposed project vicinity or in the region.			
TRANS-6: The Recommended Alternative would not substantially increase transportation hazards due to a design feature.	Less than significant	No mitigation is required	Less than significant
Groundwater and Soils			
GW-1: Implementation of the Recommended Alternative could expose soils containing toxic substances, associated with prior uses, which would be deleterious to humans, based on regulatory standards established by the lead agency.	Less than significant	No mitigation is required	Less than significant
GW-2: Construction and operation of the Recommended Alternative would not result in changes in the rate or direction of movement of existing contaminants; expansion of the area affected by contaminants; or increased level of soil or groundwater contamination, which would increase risk of harm to humans.	Less than significant	No mitigation is required	Less than significant
Hazards and Hazardous Materials			
RISK-1: Recommended Alternative related terminal modifications would not result in a measurable increase in the probability of a terrorist attack and would not result in adverse consequences to the Project site and nearby areas.	Less than significant	No mitigation is required	Less than significant
Marine Transportation			
VT-1a: Recommended Alternative construction-related marine traffic would not substantially interfere with operation of designated vessel traffic lanes and/or impair the level of safety for vessels navigating the Main Channel, Harbor, or Precautionary Area.	Less than significant	No mitigation is required	Less than significant

Table 3: Less Than Significant Environmental Impacts for the Recommended Alternative (Alternative 5)

Environmental Impact	Impact Determination	Mitigation Measures	Impacts after Mitigation
VT-1b: Recommended Alternative operation-related marine traffic would not substantially interfere with operation of designated vessel traffic lanes and/or impair the level of safety for vessels navigating the Main Channel, Harbor, or Precautionary Area.	Less than significant	No mitigation is required	Less than significant
Noise			
NOI-2: Construction of the Recommended Alternative would not result in noise levels that would exceed the ambient noise level by 5 dBA at noise-sensitive receptors between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday.	Less than significant	No mitigation is required	Less than significant
NOI-3: Operations of the Recommended Alternative would not cause the ambient noise level measured at the property line of affected uses (i.e., sensitive receptors) to increase by a CNEL of 3 dBA to or within 'normally unacceptable' or 'clearly unacceptable' land use categories, or any increase in CNEL of 5 dBA or greater.	Less than significant	No mitigation is required	Less than significant
Water Quality, Sediments, and Oceanography			
WQ-1: The Recommended Alternative would not create pollution, contamination, or a nuisance as defined in Section 13050 of the California Water Code or cause regulatory standards to be violated in Harbor waters.	Less than significant	No mitigation is required.	Less than significant

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3.2 Findings Regarding Environmental Impacts Found to Be Significant and Unavoidable

The EIS/EIR concludes that unavoidable significant impacts on the following environmental resources would occur if the Recommended Alternative was implemented.

- Air Quality and Meteorology
- Biological Resources
- Cultural Resources
- Greenhouse Gas Emissions

All available feasible mitigation measures have been incorporated into the Recommended Alternative to reduce significant impacts. However, even with the incorporation of all feasible mitigation measures, impacts on these environmental resources would remain significant and unavoidable. The Board has determined that no additional feasible mitigation measures or alternatives would reduce significant impacts to less-than-significant levels, and in light of specific economic, legal, social, technological, and other considerations, the Board intends to adopt a Statement of Overriding Considerations (see Chapter 1 of this document for additional details). The impacts, mitigation measures, findings, and rationale for the findings are presented for all significant and unavoidable impacts identified in the Final EIS/EIR below.

3.2.1 Air Quality and Meteorology

As discussed in Section 3.2 of the EIS/EIR, there would be four unavoidable significant impacts to air quality and meteorology related to construction and operation as a result of the Recommended Alternative. However, mitigation measures were identified for the significant and unavoidable impacts to air quality. The impacts and mitigation measures are discussed below.

Impact AQ-1: The Recommended Alternative would result in construction-related emissions that exceed an SCAQMD threshold of significance in Table 3.2-6.

As shown in Tables 3.2-76A and Table 3.2-76B in Section 3.2, Air Quality and Meteorology, of the Draft EIS/EIR, the unmitigated peak daily construction emissions would exceed the South Coast Air Quality Management District (SCAQMD) daily emission thresholds for NOx in 2018 and 2019 and for VOC in 2019. Overlapping construction and operations would be significant for NOx in 2019. Therefore, unmitigated project construction emissions would be significant for VOC and NOx both prior and subsequent to mitigation.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into the Recommended Alternative that avoid or substantially lessen the significant environmental effect identified in the Final EIS/EIR. Implementation of the following mitigation measures would substantially lessen emissions from criteria pollutants associated with construction of the Recommended Alternative, as well as lessen emissions from criteria pollutants during overlap of construction and operation.

However, as shown in Tables 3.2-76A and Table 3.2-76B, construction emissions of NOx in 2018 and 2019 and VOC in 2019 would remain significant. Additionally, overlapping construction and operations for NOx in 2019 would remain significant. Specific economic, legal, social, technological, or other considerations make any additional mitigation measures infeasible. The following mitigation measures have been included to reduce impacts.

MM AQ-1: **Harbor Craft Used During Construction.** Harbor craft used during construction must be equipped with U.S. Environmental Protection Agency (EPA) Tier 3 engine standards or cleaner at all times during construction.

MM AQ-2: **On-road Trucks Used during Construction.** On-road trucks shall comply with EPA 2010 on-road emission standards or better, unless the contractor provides a written finding consistent with project contract or lease management requirements and obtains written approval from the Lead Agency that such equipment is unavailable.

MM AQ-3: **Non-Road Construction Equipment** (except vessels, harbor craft, on-road trucks, and dredging equipment). All non-road construction equipment greater than 50 hp must meet EPA Tier 4 emission standards, unless the contractor provides a written finding consistent with project contract or lease management requirements and obtains written approval from the Lead Agency that such equipment is unavailable.

MM AQ-4: **Cargo Ships Used During Construction.** All ships and barges used primarily to deliver construction-related materials or cranes shall comply with the expanded Vessel Speed Reduction Program (VSRP) of 12 knots between 40 nautical miles (nm) from Point Fermin and the Precautionary Area.

MM AQ-5: **General Construction Mitigation Measure.** All dredging equipment must be electric, if available. For MM AQ-1 through MM AQ-4, if a CARB-certified technology becomes available that is as good as or better than the existing measure in terms of emissions performance, the technology could replace the existing technology if approved by LAHD.

Rationale for Finding

Changes or alterations have been incorporated into the Recommended Alternative in the form of mitigation measures **MM AQ-1** through **MM AQ-5**, which would reduce criteria pollutant emissions associated with construction. While mitigation measures presented in the Final EIS/EIR reduce emissions, emissions would still exceed SCAQMD significance criteria during construction for NOx in 2018 and 2019 and for VOC in 2019. In addition, although emissions from overlapping construction and operation would be reduced with mitigation, they would remain significant and unavoidable for NOx in 2019.

Emissions would largely come from off-road construction equipment (including dredging equipment) and marine sources (including ships used to deliver cranes and tugboats used to assist dredging barges), as well as haul trucks used for pile deliveries and disposal of dredged material. As part of the Draft EIS/EIR, mitigation was developed aimed at reducing these emissions through construction equipment fleet modernization and the Vessel Speed Reduction Program (VSRP). Mitigation measures **MM AQ-1** through **MM AQ-5** represent feasible means to reduce air pollution impacts from construction sources.

Mitigation measures **MM AQ-2** and **MM AQ-3** have been modified in the Final EIS/EIR in response to public comments to clarify that if equipment identified in the mitigation measure is unavailable, a contractor must make a written finding and obtain written approval from LAHD. In addition, mitigation measure **MM AQ-5** was modified in the Final EIS/EIR in response to public comments to require that all dredging equipment must be electric, if available. The modifications to mitigation measures **MM AQ-2**, **MM AQ-3**, and **MM AQ-5** would not lessen the effectiveness of the mitigation measures and thus the modifications would not result in any new significant environmental impacts or a substantial increase in the severity of an existing environmental effect. However, NOx and VOC impacts would remain significant and unavoidable with implementation of mitigation measures **MM AQ-2**, **MM AQ-3**, and **MM AQ-5**, as modified. All mitigation measures determined feasible by LAHD have been identified in the Final EIS/EIR.

Impact AQ-2: Recommended Alternative construction would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-7.

As shown in Table 3.2-78 of the Draft EIS/EIR, maximum off-site ambient air pollutant concentrations would exceed SCAQMD thresholds for NO_2 (federal and state 1-hour average). Additionally, as shown on Tables 3.2-80 and 3.2-81in the Draft EIS/EIR respectively, overlapping construction and operations would be significant for PM_{10} (24-hour and annual average). Therefore, without mitigation, maximum offsite ambient pollutant concentrations associated with the construction of the Recommended Alternative would be significant for NO_2 (federal and state 1-hour average), and overlapping construction and operations would be significant for PM_{10} (24-hour and annual average).

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into the Recommended Alternative that avoid or substantially lessen the significant environmental effects identified in the Final EIS/EIR. Implementation of mitigation measures **MM AQ-1** through **MM AQ-5**, as presented above under Impact AQ-1, would substantially lessen offsite ambient pollutant concentrations associated with the construction of the Recommended Alternative, as well as overlap of construction and operation relative to the unmitigated project levels.

Table 3.2-78 in the Draft EIS/EIR shows that the maximum off-site federal 1-hour NO_2 concentration from construction activities would be reduced with mitigation but would remain significant; however maximum off-site state 1-hour NO_2 concentration from construction activities would be reduced with mitigation to less than significant levels. Table 3.2-80 in the Table 3.2-81 in the Draft EIS/EIR shows that the maximum off-site incremental PM_{10} (24-hour and annual average) concentration from overlapping construction and operational activities would be reduced with mitigation but would remain significant.

Therefore, even with implementation of mitigation measures, maximum off-site ambient air pollutant concentrations for construction emissions would be significant and unavoidable for NO_2 (federal 1-hour average). Overlapping construction and operations would be significant and unavoidable for PM_{10} (24-hour and annual average). The residual air quality impacts would be temporary but significant after mitigation. Specific economic, legal, social, technological, or other considerations make any additional mitigation measures infeasible.

Rationale for Finding

Changes or alternations have been incorporated into the Recommended Alternative in the form of mitigation measures **MM AQ-1** through **MM AQ-5**, which would reduce the ambient impact relative to project levels. Emissions would largely come from off-road construction equipment (including dredging equipment) and marine sources (including ships used to deliver cranes and tugboats used to assist dredging barges), as well as haul trucks used for pile deliveries and disposal of dredged material.

As part of the Draft EIS/EIR, mitigation was developed aimed at reducing these emissions through construction equipment fleet modernization, fugitive dust controls, and Best Management Practices (BMPs). Construction equipment emissions would be reduced as a result of the mitigation measures, but would remain significant and unavoidable for NO_2 (federal 1-hour) and PM_{10} (24-hour average). Mitigation measures **MM AQ-1** through **MM AQ-5** represent feasible means to reduce air pollution impacts from construction sources. Mitigation measures **MM AQ-2**, **MM AQ-3**, and **MM AQ-5** were modified in the Final EIR (See Rationale for Finding under Impact AQ-1 above). All mitigation measures determined feasible by LAHD have been identified in the Final EIS/EIR.

AQ-3: The Recommended Alternative would result in operational emissions that exceed an SCAQMD threshold of significance in Table 3.2-8.

As shown in Table 3.2-86 in Chapter 3, Section 3.2.2, of the Final EIS/EIR, emissions from the Recommended Alternative's peak daily operations would exceed SCAQMD significance thresholds for NOx in 2019 and CO and VOC in 2033 and 2038 prior to mitigation. While the Draft EIS/EIR identified that operations would also be significant for NO_X in 2033 and 2038

(see Table 3.2-86 in the Draft EIS/EIR), NOx emissions were recalculated in the Final EIR based on based on comments received during the public review period for the Draft EIS/EIR (see modifications made to Appendix B.1 in Chapter 3 Section 3.2.9 of the Final EIR). As a result of the modifications, impacts for NOx were determined to be below SCAQMD thresholds in 2033 and 2038 prior to mitigation, however, impacts for NOx in 2019 remain significant.

The largest contributors to peak daily operational emissions in all analysis years would be emissions from container ship transit. Container ship hoteling, trucks, and locomotives would be key secondary contributors. Emissions for CO, VOC, PM_{10}, $PM_{2.5}$, and SO_X would increase between years 2019 and 2033 due to terminal throughput increase. Emissions would decline slightly for all pollutants from year 2033 to 2038 as regulatory requirements for trucks, locomotives, and cargo handling equipment (CHE) continue to reduce emission factors after the terminal reached its operating capacity in 2033. Therefore, air quality impacts associated with project daily peak operations would be significant for NOx in 2019 and CO and VOC in 2033 and 2038 prior to mitigation.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the Recommended Alternative that avoid or substantially lessen the significant environmental effect identified in the Final EIS/EIR. The implementation of mitigation measures **MM AQ-6** and **MM AQ-7** and LAHD's standard lease measures **LM AQ-1** and **LM AQ-2** would reduce operational emissions.

MM AQ-6: Vessel Speed Reduction Program (VSRP). Starting January 1, 2019, and thereafter, 95 percent of Evergreen ships calling at the Everport Container Terminal shall be required to comply with the expanded VSRP at 12 knots between 40 nm from Point Fermin and the Precautionary Area. Starting January 1, 2026, 95 percent of all ships calling at the Everport Container Terminal will follow this requirement. Alternative Compliance Plans will be considered where a different speed that would result in fewer emissions compared to the current speed limits.

Any alternative compliance plan shall be submitted to LAHD at least 90 days in advance for approval and shall be supported by data that demonstrates the ability of the alternative compliance plan for the specific vessel and type to achieve emissions reductions comparable to or greater than those achievable by compliance with VSRP. The alternative compliance plan shall be implemented once written notice of approval is granted by the LAHD.

MM AQ-7: Alternative Maritime Power (AMP). By 2020 or upon substantial completion of construction, 90 percent of Evergreen ships calling at the Everport Terminal must use AMP. By 2026, 95 percent of all ship calls at the Everport Container Terminal must use AMP or approved equivalent under the CARB Shore-Power Regulation. The equivalent alternative technology must, at a minimum, meet the emissions reductions that would be achieved from AMP.

LM AQ-1: Replacement of Equipment and Review of New Technology. When the tenant needs to replace or turnover equipment in its fleet, the tenant shall meet with the LAHD to determine if something is feasible or technologically available that may result in fewer emissions. If any kind of technology

becomes available and is shown to be as good as or better than the existing measure in terms of emissions reduction performance, the technology could replace the requirements of other mitigation measures pending approval by LAHD.

LAHD shall require the tenant to review any new emissions-reduction technology for feasibility and report back to LAHD every five years beginning five years after lease agreement if no new purchase or equipment turnover occurs sooner as noted in the abovementioned paragraph. If LAHD and tenant determine the technology is feasible in terms of cost and operations, the tenant shall work with LAHD to implement such technology.

LM AQ-2: Priority Access System. A priority access system shall be evaluated to identify one or more ways to provide preferential access to zero- and near-zero-emission trucks. The tenant shall provide a report to LAHD on preferential access system options by January 1, 2020.

Following the implementation of the mitigation and lease measures, the Recommended Alternative's peak daily operational emissions for NOx in 2019 would be reduced to a less-than-significant level with mitigation. Operational emissions for CO and VOC would be reduced but would remain above the level of significance in 2033 and 2038. Specific economic, environmental, legal, social, technological, or other considerations make any additional mitigation measures infeasible.

The Board finds that specific economic, environmental, legal, social, technological, or other considerations make infeasible additional mitigation measures or project alternatives identified in the Final EIS/EIR (refer to Chapter 6 of this document for additional information on mitigation and Chapter 2, Master Response 1 – Feasible Mitigation – Guidance and Applicability, of the Final EIS/EIR). All mitigation measures determined feasible by LAHD as identified in the Final EIS/EIR have been incorporated into the Recommended Alternative. Nevertheless, even with the incorporation of feasible mitigation measures, impacts would remain significant and unavoidable.

Rationale for Finding

For the Recommended Alternative, terminal activity would increase in each study year. However, regulatory requirements would serve to reduce emission factors from most project sources. In addition, as equipment ages, engine efficiency would decrease and emission factors would increase in comparison to brand-new equipment. The largest contributors to peak daily operational emissions in all analysis years would be emissions from container ship transit. Container ship hoteling, trucks, and locomotives would be key secondary contributors. Emissions for CO, VOC, PM_{10}, $PM_{2.5}$, and SO_X would increase between years 2019 and 2033 due to terminal throughput increase. Emissions would decline slightly for all pollutants from year 2033 to 2038 as regulatory requirements for trucks, locomotives, and CHE continue to reduce emission factors after the terminal reached its operating capacity in 2033.

As part of the Draft EIS/EIR, mitigation was developed aimed at reducing these emissions through compliance with the VSRP, implementation of AMP while hoteling at the Port, and periodic review and substitution of new technology and regulations. Mitigation measures **MM AQ-6** and **MM AQ-7** and lease measures **LM AQ-1** and **LM AQ-2** have been incorporated into the project, which substantially lessen significant daily peak operational emissions and represent feasible means to reduce air pollution impacts from project operational sources.

Mitigation measure **MM AQ-7** has been modified in the Final EIS/EIR in response to public comments to increase the percentage of Evergreen ships calling at the Everport Container Terminal that must use AMP from 85 percent to 90 percent. The modifications to mitigation measure **MM AQ-7** would slightly improve the effectiveness of the mitigation measure and thus the modifications to the mitigation measure would not result in any new significant environmental impacts or a substantial increase in the severity of an existing environmental effect. Peak day emissions of NO_X would be reduced to levels that are less than significant. CO and VOC emissions from operations associated with the Recommended Alternative would be reduced as a result of the mitigation measures, including mitigation measure **MM AQ-7** as modified, but would remain significant and unavoidable. All mitigation measures determined feasible by LAHD have been identified in the Final EIS/EIR.

Impact AQ-4: Recommended Alternative operations would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-9.

As shown in Tables 3.2-87 and 3.2-88 of the Draft EIS/EIR, the maximum off-site NO_2 (federal 1-hour average) concentration from operational activities and maximum off-site incremental PM_{10} (24-hour and annual average) and $PM_{2.5}$ (24-hour average) concentrations from operational activities would exceed SCAQMD thresholds. Therefore, maximum off-site ambient pollutant concentrations associated with operation of the Recommended Alternative would be significant under CEQA for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual average), and $PM_{2.5}$ (24-hour average) prior to mitigation.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into the Recommended Alternative that avoid or substantially lessen the significant environmental effect identified in the Final EIS/EIR. Implementation of mitigation measures **MM AQ-6** and **MM AQ-7**, as presented above under Impact AQ-3, would substantially lessen offsite ambient air pollutant concentrations associated with the operation of the Recommended Alternative. However, ambient pollutant levels would remain significant and unavoidable for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual averages), and $PM_{2.5}$ (24-hour average). Specific economic, legal, social, technological, or other considerations make any additional mitigation measures infeasible.

Rationale for Finding

Similar to Impact AQ-3, operational emissions would vary over the life of the Recommended Alternative due to several factors, such as regulatory requirements, activity levels, source characteristics (container ships, tugboats, trucks, locomotives, CHE, and worker vehicles), and emission factors. As part of the Draft EIS/EIR, mitigation was developed aiming at reducing these emissions through compliance with VSRP and implementation of AMP.

Changes or alternations have been incorporated into the Recommended Alternative in the form of mitigation measures **MM AQ-6** and **MM AQ-7**, which would reduce the ambient impact relative to Recommended Alternative levels and represent feasible means to reduce air pollution impacts from operation sources. Mitigation measure **MM AQ-7** was modified in the Final EIR (See Rationale for Finding under Impact AQ-3 above). Ambient pollutant levels during operations would be reduced as a result of the mitigation measures, but would remain significant and unavoidable for NO_2 (federal 1-hour average), PM_{10} (24-hour and annual

averages), and $PM_{2.5}$ (24-hour average). All mitigation measures determined feasible by LAHD have been identified in the Final EIS/EIR.

3.2.2 Biological Resources

As discussed in Section 3.3 of the Draft EIS/EIR, there would be one significant and unavoidable impact to Biological Resources as a result of the Recommended Alternative. The impact and mitigation measure is discussed below.

Impact BIO-3: The Recommended Alternative has the potential to introduce noise, light, or nonnative species into the Harbor that could substantially disrupt local biological communities.

The Recommended Alternative would increase the annual ship calls relative to the baseline. As such, operation of the Recommended Alternative has the potential to result in the introduction of nonnative species into the Harbor via ballast water or vessel hulls which could substantially disrupt local biological communities. Impacts, therefore, would be significant without mitigation.

Finding

The Board hereby finds that no feasible mitigation is currently available to totally prevent the introduction of invasive species via vessel. This infeasibility of mitigation to address invasive species is confirmed by the National Marine Fisheries Service (refer to Comment NMFS in Chapter 2 of the Final EIS/EIR). Therefore, impacts associated with the potential for invasive species to be introduced that may disrupt marine biological communities would remain significant and unavoidable.

Rationale for Finding

The annual ship calls and amount of ballast water discharged into the Main Channel area would increase relative to the baseline conditions as a result of the Recommended Alternative. However, no feasible mitigation is available to prevent or minimize the accidental introduction of non-native species via vessels. Impacts would remain significant and unavoidable for the introduction of invasive exotic species due to more and larger container ships using the Port as a result of the Recommended Alternative. There is no feasible mitigation identified by LAHD to eliminate this impact.

3.2.3 Cultural Resources

As discussed in Section 3.4 of the Draft EIS/EIR, there would be two significant and unavoidable impacts to Cultural Resources as a result of the Recommended Alternative. The impacts and mitigation measures are discussed below.

Impact CR-1: The Recommended Alternative would have a significant impact on built environment historical resources.

The former Canner's Steam Company Plant and associated distribution pipelines, eligible for listing in the CRHR and as a City of Los Angeles Historic Cultural Monument would be demolished as part of backlands development.

The Recommended Alternative would expand the terminal onto the 22-acre backlands expansion area and include the demolition of the former Canner's Steam Company Plant, which would result in a significant adverse impact to a historic resource.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the Recommended Alternative that avoid or substantially lessen the significant environmental effect identified in the Final EIS/EIR. The implementation of mitigation measure **MM CR-1,** presented below, would reduce the impacts of demolition on a historic property. However, impacts to a historical property would remain significant and unavoidable. The development of the backland expansion area is an essential element of the Recommended Alternative (relocated gate and expanded backland storage area), which contributes to the Recommended Alternative meeting the project objectives. Specific economic, environmental, legal, social, technological, or other considerations make any additional mitigation measures infeasible.

MM CR-1: **Historic Resource Recordation.** Prior to demolition of the former Canner's Steam Company Plant (located within the 22-acre backland improvement area shown in Figure 2-4 of Chapter 2, Project Description, and Figure 3.4-6 of Section 3.4, Cultural Resources of the Draft EIS/EIR), archival documentation of the building will be completed in the form of a Historic American Building Survey (HABS) that shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The documentation shall include large-format photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian and shall be placed in the Port archives.

Rationale for Finding

Expansion of the backlands would require demolition of the former Canner's Steam Company Plant. As part of the Draft EIS/EIR, mitigation measures have been incorporated into the Recommended Alternative in the form of mitigation measure **MM CR-1**, which requires archival documentation of the building. **MM CR-1** lessens but does not completely eliminate the significant impact to historic resources. Therefore, even with mitigation measure **MM CR-1**, impacts to historic resources would remain significant and unavoidable.

Impact CR-2: The Recommended Alternative would cause a substantial adverse change in the significance of an archaeological or ethnographic resource.

One historic period archaeological site has been identified in the 22-acre backlands expansion area. It is associated with a former Japanese Fishing Village. Excavation for the development of the 22-acre backlands expansion area under the Recommended Alternative would likely disturb, damage, and/or degrade associated archaeological resources, which would be a significant impact.

Impacts to archaeological resources from construction within the existing terminal boundary and 1.5-acre backland expansion area are not expected to be significant due to the disturbed nature of the subsurface. However, as it is impossible to completely rule out encountering previously unknown archaeological or ethnographic resources during construction.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the Recommended Alternative that avoid or substantially lessen the significant environmental effect identified in the Final EIS/EIR. The implementation of mitigation measures **MM CR-2**, presented below, would address impacts to archaeological resources within the 22-acre backlands area. In addition, mitigation measure **MM CR-3** and standard condition **SC CR-1** would also address unanticipated cultural resources discoveries during construction. However, development of the 22-acre backland expansion area would likely disturb, damage, and/or degrade archaeological resources associated with the former Japanese Fishing Village and therefore impacts to a historical property would remain significant and unavoidable. Specific economic, legal, social, technological, or other considerations make any additional mitigation measures infeasible. Application of **SC CR-1** and implementation of mitigation measure **MM CR-3** would address potential impacts associated with development within the existing terminal and 1.5-acre expansion area; therefore, impacts would be less than significant.

MM CR-2: **Completion of Phase I Cultural Resource Investigation.** A Phase I investigation shall be completed by a qualified archaeologist for all un-surveyed areas of the 22-acre backlands (shown in Figure 2-4 of Chapter 2, Project Description, and Figure 3.4-6 of Section 3.4, Cultural Resources of the Draft EIS/EIR) to rule out the presence of significant resources. Phase II and III investigations shall be completed if significant archaeological resources are not ruled out. Furthermore, pre-construction worker training shall be completed if significant resources are not ruled out. Furthermore, pre-construction worker training shall be completed as described in MM CR-3.

MM CR-3: **Pre-construction Worker Training.** Prior to the commencement of landside construction activities, qualified archaeologist and paleontologist retained by the LAHD or their designee shall provide training to construction personnel to provide information on regulatory requirements for the protection of cultural resources. This training may take the form of examples of cultural resources to look for and protocols to follow if discoveries are made. The archaeologist/paleontologist shall develop the training and any supplemental materials necessary to execute said training.

SC CR-1: **Stop Work in the Area if Prehistoric and/or Archaeological Resources are Encountered.** In the unlikely event that any prehistoric artifact is encountered during construction, work shall be immediately stopped and the area secured until the materials found can be assessed by a qualified archaeologist.

Rationale for Finding

Expansion of the backlands would likely disturb, damage, and/or degrade archaeological resources associated with the former Japanese Fishing Village. As part of the Draft EIS/EIR, mitigation measures and standard conditions have been incorporated into the Recommended Alternative in the form of mitigation measure **MM CR-2**, **MM CR-1**, and standard condition **SC CR-1** which lessens but does not completely eliminate the significant impact to archaeological resources. Therefore, even with mitigation measure **MM CR-2**, **MM CR-1**, and standard condition **SC CR-1,** impacts to archaeological resources would remain significant and unavoidable. All mitigation measures determined feasible by LAHD have been identified in the Final EIS/EIR.

3.2.4 Greenhouse Gas Emissions

As discussed in Section 3.5 of the Draft EIS/EIR, there would be one unavoidable significant impact on GHG emissions related to construction and operation of the Recommended Alternative. The impact and mitigation measures are discussed below.

Impact GHG-1: The Recommended Alternative would generate GHG emissions, either directly or indirectly, that would exceed the SCAQMD 10,000 mty CO_{2e} threshold.

The Recommended Alternative's GHG emissions minus the CEQA baseline would exceed the GHG threshold of 10,000 mty in 2026, 2033, and 2038's operational analysis years. Emissions from all source types would increase over the life of the Recommended Alternative because of terminal throughput increase. Recommended Alternative GHG emissions would be significant under CEQA in analysis years 2026, 2033, and 2038 prior to mitigation.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the Recommended Alternative that avoid or substantially lessen the significant environmental effect identified in the Final EIS/EIR. The implementation of mitigation measures **MM AQ-2, MM AQ-6,** and **MM AQ-7** and LAHD's standard lease measures **LM AQ-1** and **LM AQ-2** as described above under Section 3.2.1, Air Quality and Meteorology, would reduce GHG emissions. In addition, mitigation measures **MM GHG-1** and **MM GHG-2** and LAHD's standard lease measure **LM GHG-1** shown below would further reduce future GHG emissions. However, annual GHG emissions would remain significant and unavoidable. Specific economic, legal, social, technological, or other considerations make any additional mitigation measures infeasible.

MM GHG-1: LED Lighting. All fixtures on the high mast poles at the Everport Container Terminal shall be replaced with LED fixtures or a technology with similar energy-saving capabilities.

MM GHG-2: Solar Electricity. Photovoltaic panels shall be installed over the employee parking lot as part of the development of the 22 acres, pending a feasibility study.

LM GHG-1: GHG Credit Fund. Project GHG emissions are 99,856 metric tons of CO2e in the peak year of operations in 2038. They exceed the 10,000 metric ton CO2e significance threshold by 89,856 metric tons. Because operational GHG emissions exceed the

significance threshold with the incorporation of all feasible mitigation measures, LAHD shall establish a carbon offset fund, which may be accomplished through a Memorandum of Understanding with the California Air Resources Board or another appropriate entity, to mitigate project GHG impacts to the maximum extent feasible. The fund shall be used for GHG-reducing projects and programs on Port of Los Angeles property. It shall be the responsibility of the Tenant to contribute to the fund. Fund contribution shall be the equivalent of 1% of the minimum annual guarantee (MAG) at the time that project construction will commence. This amount will be approximately $300,000, payable upon substantial completion of project construction. This amount is appropriate because it takes into account the tenant's actual container throughput and assesses a fee in correlation with the facility's GHG maximum feasible contribution level. This also takes into account the cost of the project, including on-site GHG-reducing mitigation measures that the tenant will be required to implement (LED high mast lighting and solar panels over the employee parking lot). If LAHD is unable to establish the fund within a reasonable period of time, Tenant shall instead purchase credits from an approved GHG offset registry in the amount of approximately $300,000.

Rationale for Finding

Emissions would increase because of terminal throughput increase over the life of the Recommended Alternative. As part of the Draft EIS/EIR, mitigation and lease measures were developed that are aimed at reducing emissions through reduced fossil fuel use and installing power-saving technology. Changes or alternations have been incorporated into the Recommended Alternative in the form of mitigation measures **MM AQ-2, MM AQ-6, MM AQ-7, MM GHG-1,** and **MM GHG-2,** and lease measures **LM AQ-1, LM AQ-2**, and **LM GHG-1** which represent feasible means to reduce GHG emissions. Lease measure **LM GHG-1** has been modified in the Final EIS/EIR in order to clarify how contributions to the credit fund are determined, to revise the amount GHG emissions associated with the Recommended Alternative and to increase the amount of GHG off-set credits to be paid by the Tenant from $250,000 to approximately $300,000. The modifications to lease measure **LM GHG-1** would not reduce the effectiveness of the lease measure and thus the modifications would not result in any new significant environmental impacts or a substantial increase in the severity of an existing environmental effect. Impacts would be reduced as a result of implementation of mitigation measures **MM AQ-2, MM AQ-6, MM AQ-7, MM GHG-1,** and **MM GHG-2,** and lease measures **LM AQ-1, LM AQ-2**, and **LM GHG-1** (as modified), but impacts would remain significant and unavoidable for annual GHG emissions. All mitigation measures determined feasible by LAHD have been identified in the Final EIS/EIR. In addition, refer to Chapter 6 of this document for additional information on mitigation.

3.3 Findings Regarding Environmental Impacts Found to Be Less than Significant after Mitigation

The Final EIS/EIR concludes that less-than-significant impacts would occur after mitigation on the following environmental resources if the Recommended Alternative was implemented.

- Biological Resources
- Noise

In addition, the Final EIS/EIR concludes that some, but not all, impacts of the Recommended Alternative in the following resource areas were found to be less than significant prior to mitigation. However, mitigation measures and/or standard conditions of approval were still identified for the less-than-significant impacts in the following areas, to further ensure that impacts remain minimal.

- Biological Resources
- Cultural Resources

The following Findings pertain to environmental impacts of the Recommended Alternative for which mitigation measures and/or standard conditions of approval have been identified in the Final EIS/EIR that will avoid or substantially lessen the significant environmental effects to a less-than-significant level.

3.3.1 Biological Resources

As discussed in Section 3.3 of the Draft EIS/EIR, there would be one significant impact to Biological Resources that would be mitigated to less than significant levels as a result of mitigation measures incorporated into the Recommended Alternative. The impact and mitigation measures are discussed below.

Impact BIO-1: The Recommended Alternative could cause a loss of individuals or habitat of a state- or federally listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern or the loss of federally listed critical habitat.

King and sheet pile driving is anticipated to result in disturbance (Level B harassment) to marine mammals (particularly harbor seals and sea lions) in the vicinity of pile driving operations. Impacts to marine mammals in the vicinity of pile driving operations would be significant before mitigation.

Increased vessel activity from the Recommended Alternative would result in increased noise levels. However, impacts are not considered significant because this would not lead to the loss of individuals or habitat of sensitive species. The increase in vessel traffic would also increase the likelihood of a vessel collision with a marine mammal or sea turtle, which could result in injury or mortality. This impact is considered less than significant because of the low probability of vessel strikes; however, any increase in vessel traffic caused by the Recommended Alternative may incrementally increase the potential for vessel strikes.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the Recommended Alternative that avoid or substantially lessen the environmental effect identified in the Final EIS/EIR. The implementation of mitigation measure **MM BIO-1**, shown below would reduce impacts on marine mammals as a result of pile driving during construction to a less than significant level. While impacts to marine mammals and sea turtles from vessel strikes during project operation are less than significant without mitigation, **MM AQ-6**, described under Impact AQ-3 would further reduce impacts.

MM BIO-1 **Protect Marine Mammals.** Although it is expected that marine mammals will voluntarily move away from the area at the commencement of the vibratory or "soft start" of pile driving activities, as a precautionary measure, pile driving activities occurring as part of the sheet pile and king pile installation will include establishment of a safety zone, by a qualified marine mammal professional, and the area surrounding the operations (including the safety zones) will be monitored for marine mammals by a qualified marine mammal observer.[1]

The pile driving site will move with each new pile; therefore, the safety zones will move accordingly.

[1] Marine mammal professional qualifications shall be identified based on criteria established by LAHD during the construction bid specification process. Upon selection as part of the construction award winning team, the qualified marine mammal professional shall develop site specific pile driving safety zone requirements, which shall follow NOAA Fisheries Technical Guidance Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (NOAA Fisheries 2016) in consultation with the Acoustic Threshold White paper prepared for this purpose by LAHD (LAHD 2017). Final pile driving safety zone requirements developed by the selected marine mammal professional shall be submitted to LAHD Construction and Environmental Management Divisions.

Rationale for Finding

Changes or alternations have been incorporated into the Recommended Alternative in the form of mitigation measures **MM AQ-6** and **MM BIO-1**. Mitigation measure **MM AQ-6** would be implemented to mitigate air quality impacts rather than to mitigate a significant impact to biological resources, but would have the added benefit of further decreasing the likelihood of a vessel collision with a marine mammal or sea turtle by requiring 95 percent of the Evergreen ships calling at the Everport Container Terminal to comply with the expanded Vessel Speed Reduction Program at 12 knots between 40 nm from Point Fermin and the Precautionary Area. Mitigation measure **MM BIO-1** would reduce potentially significant impacts on marine mammals resulting from noise associated with pile driving by requiring initiation of pile driving with a soft start and establishment of a safety zone, as well as monitoring by a qualified marine mammal observer. The footnote for mitigation measure MM BIO-1 was modified in the Final EIR to remove specified timing for submitting pile driving safety zone requirements to LAHD. Thus, the modifications to the **MM BIO-1** would not lessen the effectiveness of the mitigation measure in reducing impacts associated with pile driving. Therefore, implementation of mitigation measure **MM BIO-1** would reduce impacts associated with the loss of individuals, or the reduction of existing habitat, of a state- or federally-listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern to a less-than-significant level. While **MM AQ-6** is not necessary to mitigate a significant impact to marine mammals to a less than significant level, its implementation to mitigate air quality

impacts would have the additional effect of further lessening an already less than significant impact to marine mammals.

3.3.2 Cultural Resources

As discussed in Section 3.4 of the Draft EIS/EIR, there would be one less than significant impact to Cultural Resources for which an additional condition is applied. The standard condition of approval is discussed below.

Impact CR-3: The Recommended Alternative would not result in the permanent loss of, or loss of access to, a significant paleontological resource.

The Project site is located on Terminal Island, which was created by filling over and extending Rattlesnake Island with dredge material. Because the site was created primarily using dredged material (imported fill) and Rattlesnake Island has been heavily disturbed and/or overlain with imported fill, project excavation would not be expected to encounter or yield significant paleontological resources or unique geologic features, and significant impacts to paleontological resources are not expected.

Finding

The Board hereby finds that although the Recommended Alternative would result in a less-than- significant impact on paleontological resources, changes or alterations have been required in, or incorporated into, the Recommended Alternative to ensure the appropriate actions are carried out should any paleontological resources be encountered. This standard condition is described below and will be incorporated into the Recommended Alternative via the Mitigation Monitoring and Reporting Program.

SC CR-2: **Unanticipated Discovery of Paleontological Resources.** In the event that a paleontological resource is encountered during construction, the contractor shall stop construction and a qualified paleontologist shall evaluate the significance of the resource. Additional monitoring recommendations may be made at that time. If the resource is found to be significant, the paleontologist shall systematically remove and stabilize the specimen(s) in anticipation of preservation. Curation of the specimen shall be in a qualified research facility, such as the Los Angeles County Natural History Museum.

Rationale for Finding

In the highly unlikely event that paleontological resources are identified during construction, **SC CR-2** would ensure that the resources were evaluated and removed for preservation according to professional standards. Residual impacts would remain less than significant.

The Recommended Alternative would not disturb, damage, or degrade paleontological resources. However, as it is impossible to completely rule out encountering previously unknown paleontological resources during construction, changes or alternations have been incorporated into the Recommended Alternative in the form of standard condition **SC CR-2** which requires construction activities to cease in the area if paleontological resources are encountered until a qualified paleontologist can be retained to evaluate the find. Standard condition **SC CR-2** would be implemented not to mitigate a potentially significant

environmental impact, but rather to further reduce any potential impacts to any previously unknown paleontological resource during construction. Therefore, implementation of standard condition **SC CR-2** would ensure that impacts associated with paleontological resources remain less than significant.

3.3.3 Noise

As discussed in Section 3.10 of the Draft EIS/EIR, there would be one significant impact related to Noise generated during project construction. This impact would be mitigated to less than significant levels as a result of mitigation measures incorporated into the Recommended Alternative. The impacts and mitigation measures are discussed below.

Impact NOI-1: Construction of the Recommended Alternative could result in daytime construction activities lasting more than 10 days in a three-month period that would exceed existing ambient exterior noise levels by 5 dBA or more at noise-sensitive receptors.

Noise produced by daytime pile driving during wharf construction alone or pile driving in combination with general construction would increase average ambient noise levels at Fish Harbor by 6 dBA and at San Pedro waterfront commercial- and tourism-based uses by 8 dBA over existing levels. These impacts would be temporary but significant without mitigation.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the Recommended Alternative that avoid or substantially lessen the significant environmental effect identified in the Final EIS/EIR. The implementation of mitigation measures **MM NOI-1** and **MM NOI-2**, as follows, would reduce impacts on the ambient noise level at Fish Harbor and San Pedro waterfront commercial- and tourism-based uses as a result of construction of the Recommended Alternative.

MM NOI-1: **Noise Reduction during Pile Driving.** The contractor shall be required to use a pile driving system which is capable of limiting maximum noise levels at 50 feet from the pile driver to 104 dBA, or less, for wharf construction.

MM NOI-2: **Utilize Temporary Noise Attenuation Curtain Adjacent to Pile-Driving Equipment.** If under MM NOI-1 the reduced pile driving noise exceeds 103 dBA at 50 feet from the pile driver, utilize temporary noise attenuation curtain suitable for pile driving equipment as needed. This noise attenuation device should be installed directly between the equipment and the nearest noise sensitive receptor to the construction site.

Rationale for Finding

The closest sensitive receptor to the pile driving site is the San Pedro business/tourism area west of the Project site followed by the liveaboards at Fish Harbor (see Table 3.10-9 of the Draft EIS/EIR). Noise levels at these locations will exceed ambient levels by 8 dBA and 6 dBA without mitigation. As part of the Draft EIS/EIR, changes or alternations have been incorporated into the Recommended Alternative in the form of mitigation measures **MM NOI-1** and **MM NOI-2**. Mitigation measure **MM NOI-1** requires the contractor to use a pile driving system that limits noise to 104 dBA at 50 feet from the driver. With **MM NOI-1**, noise levels would be reduced to 104 dBA at 50 feet, and results in a 3 dBA reduction at

both the San Pedro business/tourism area and Fish Harbor, resulting in a noise level of 5 dBA over ambient for the San Pedro business/tourism area, which is the threshold for a significance determination. The resulting noise at Fish Harbor would be 3 dBA over ambient, which is not significant. If under **MM NOI-1**, the pile driving noise is reduced to 103 dBA (or less) at 50 feet from the driver, the noise levels at the closest sensitive receptor (San Pedro business/tourism area) would exceed ambient levels by 4 dBA or less, which is not significant. Thus, if **MM NOI-1** reduced noise to 103 dBA or less at 50 feet, the significant impact would be mitigated to below significance and no further mitigation is required. Mitigation measure **MM NOI-2** requires the contractor to utilize a temporary noise attenuation curtain suitable for pile driving equipment. Mitigation measure **MM NOI-2** has been modified in the Final EIS/EIR to specify that a temporary noise attenuation curtain is only required if, after implementation of **MM NOI-1**, pile driving noise exceeds 103 dBA at 50 feet from the pile driver, for the reason explained above. Thus, the modifications to **MM NOI-2** would not lessen the effectiveness of the mitigation measure in reducing ambient noise levels at Fish Harbor and the San Pedro waterfront commercial- and tourism-based uses to a less than significant level. Therefore, the modification to **MM NOI-2** would not result in any new significant environmental impacts or a substantial increase in the severity of an existing environmental effect, and noise impacts would be less than significant with implementation of the mitigation measures as modified. Therefore, implementation of mitigation measures **MM NOI-1** and **MM NOI-2** would reduce impacts on the ambient noise level at Fish Harbor and San Pedro waterfront commercial- and tourism-based uses to a less-than-significant level.

3.3.4 Cumulatively Considerable Impacts

The State CEQA Guidelines (Section 15130) require an analysis of the project's contribution to significant and unavoidable cumulative impacts. Cumulative impacts include "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (State CEQA Guidelines, Section 15355). As shown on Figure 4-1 and detailed in Table 4-1 (in Chapter 4, Cumulative Analysis of the Draft EIS/EIR), a total of 70 current or reasonably foreseeable future projects (approved or proposed) were identified in the Ports of Los Angeles and Long Beach as well as the communities of San Pedro, Wilmington and Carson that have the potential to contribute to a cumulative impact.

The discussion below identifies cumulatively significant impacts that can either be mitigated to less than significant or that cannot be mitigated to a less than significant level and represent significant unavoidable impacts. All feasible mitigation measures to reduce or avoid the cumulatively considerable contribution of the Recommended Alternative to these impacts have been required in, or incorporated into, the project. However, even with the incorporation of all feasible mitigation measures, cumulative impacts on these environmental resources would remain significant and unavoidable. The Board has determined that no additional feasible mitigation measures or alternatives would reduce significant cumulative impacts to less-than-significant levels, and—in light of specific economic, legal, social, technological, and other considerations—the Board intends to adopt a Statement of Overriding Considerations (see Chapter 1 of this document for additional details). The impacts, mitigation measures, findings, and rationale for the findings are presented for all significant and unavoidable cumulative impacts identified in the Final EIS/EIR below.

According to State CEQA Guidelines Section 15130(b): "The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone.

The discussion should be guided by the standards of practicality and reasonableness..." The information presented in the Draft EIS/EIR in Chapter 4 Cumulative Analysis, meets this criterion.

3.3.5 Air Quality and Meteorology

Cumulative Impact AQ-1: The Recommended Alternative would contribute to cumulatively considerable construction-related emissions that exceed an SCAQMD threshold of significance – Cumulatively Considerable and Unavoidable

Recommended Alternative construction emissions would exceed SCAQMD significance thresholds for NO_X in 2018 and 2019 and for VOC in 2019 under CEQA. Therefore, unmitigated Recommended Alternative construction emissions would be significant for NO_X and VOC prior to mitigation under CEQA and NEPA. These impacts would combine with cumulatively significant impacts from concurrent related construction projects, and potentially other related projects. As a result, without mitigation, Recommended Alternative construction emissions would make a cumulatively considerable contribution to an existing significant cumulative impact for NO_X and VOC emissions.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the Recommended Alternative that avoid or substantially lessen the significant environmental effect identified in the Final EIS/EIR. The implementation of mitigation measures **MM AQ-1** through **MM AQ-5** would help reduce cumulatively considerable construction impacts. Although mitigation measures **MM AQ-1** through **MM AQ-5** would reduce the cumulative effect of construction emissions, the mitigation would not sufficiently reduce the Recommended Alternative's cumulatively considerable contribution to a less-than-significant level. The Board hereby finds that specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or project alternatives identified in the Final EIS/EIR. Even with the incorporation of feasible mitigation measures, the Recommended Alternative would make a cumulatively considerable contribution to a significant cumulative impact for NOx and VOC emissions during construction. After mitigation, overlapping construction and operational emissions would remain significant for NOx. As such, after mitigation, overlapping construction and operations of the Recommended Alternative would make a cumulatively considerable and unavoidable contribution to an existing significant cumulative impact for NOx and VOC emissions.

Rationale for Finding

The past, present, and reasonably foreseeable future projects for Cumulative Impact AQ-1 would result in significant cumulative impacts if their combined increase of a criteria pollutant would exceed SCAQMD significance thresholds during construction. Changes or alterations have been incorporated into the Recommended Alternative in the form of mitigation measures **MM AQ-1** through **MM AQ-5.** Mitigation measures **MM AQ-1** through **MM AQ-5** would help reduce construction emissions but not to a less-than-significant level. Cumulative air quality impacts from Recommended Alternative construction would exceed NO_X and VOC thresholds. Construction emissions would make a cumulatively considerable contribution to a significant cumulative impact. All mitigation measures determined feasible by LAHD as identified in the Final EIS/EIR have been incorporated into the Recommended Alternative.

Cumulative Impact AQ-2: The Recommended Alternative construction would result in off-site ambient air pollutant concentrations that exceed the SCAQMD thresholds of significance or substantially contribute to an existing or projected air quality standard violation—Cumulatively Considerable and Unavoidable

Construction of the Recommended Alternative would exceed the federal 1-hour ambient air thresholds for NO_2. Overlapping construction and operations of the Recommended Alternative would exceed the federal 1-hour NO_2, the 24-hour PM_{10}, and annual PM_{10} ambient air thresholds. These impacts would combine with impacts from concurrent related construction projects, and potentially other related projects, which would be cumulatively significant. As a result, without mitigation, impacts from Recommended Alternative construction would make a cumulatively considerable contribution to a significant cumulative impact related to ambient NO_2 levels. In addition, impacts from Recommended Alternative overlapping construction and operations would make a cumulatively considerable contribution to a significant cumulative impact related to ambient NO_2 and PM_{10} levels.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the Recommended Alternative that avoid or substantially lessen the significant environmental effect identified in the Final EIS/EIR. The implementation of mitigation measures **MM AQ-1** through **MM AQ-5** would help reduce cumulatively considerable construction emissions. Although mitigation measures **MM AQ-1** through **MM AQ-5** would reduce the cumulative effect of construction emissions, the mitigation would not sufficiently reduce the Recommended Alternative to a less-than-significant level for NO_2 or PM_{10}. The Board hereby finds that specific economic, environmental, legal, social, technological, or other considerations make infeasible additional mitigation measures or proposed project alternatives identified in the Final EIS/EIR.

Rationale for Finding

The past, present, and reasonably foreseeable future projects would result in significant cumulative impacts for Cumulative Impact AQ-2 if their combined ambient pollutant concentrations, during construction, would exceed the SCAQMD ambient concentration thresholds for pollutants from construction. Changes or alternations have been incorporated into the Recommended Alternative in the form of mitigation measures **MM AQ-1** through **MM AQ-5** to help reduce construction emissions; however, they would not reduce all impacts to a less-than-significant level. Construction emissions could still make a cumulatively considerable contribution to a significant cumulative impact relative to ambient NO_2 and PM_{10} levels from concurrent related project construction. All mitigation measures determined feasible by LAHD have been identified in the Final EIS/EIR.

Cumulative Impact AQ-3: The operation of the Recommended Alternative would produce a cumulatively considerable increase of a criteria pollutant that exceeds the SCAQMD peak day emission thresholds of significance—Cumulatively Considerable and Unavoidable

Recommended Alternative operational emissions would exceed SCAQMD significance thresholds for NOx in 2019, and for CO and VOC in 2033 and 2038. These impacts would combine with impacts from concurrent related projects, which would already be cumulatively significant. The Recommended Alternative's incremental contribution to that cumulatively

significant impact would be cumulatively considerable. As a result, without mitigation, project operational emissions would make a cumulatively considerable contribution to an existing significant cumulative impact for NOx, CO, and VOC.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the Recommended Alternative that avoid or substantially lessen the significant environmental effect identified in the Final EIS/EIR. The implementation of mitigation measures **MM AQ-6** and **MM AQ-7** and LAHD's standard lease measures **LM AQ-1** and **LM AQ-2** would help reduce cumulatively considerable operational emissions.

Although mitigation measures **MM AQ-6** and **MM AQ-7** and LAHD's standard lease measures **LM AQ-1** and **LM AQ-2** would reduce the cumulative effect of operational emissions, the mitigation would not sufficiently reduce the Recommended Alternative's cumulatively considerable contribution of the impact to a less-than-significant level. The Board hereby finds that specific economic, environmental, legal, social, technological, or other considerations make infeasible additional mitigation measures or proposed project alternatives identified in the Final EIS/EIR. Even with the incorporation of feasible mitigation measures, the Recommended Alternative would make a cumulatively considerable and unavoidable contribution to an existing significant cumulative impact related to NOx, CO, and VOC.

Rationale for Finding

The emissions from cumulative projects would be cumulatively significant if their combined operational emissions would exceed the SCAQMD daily operational emission thresholds. This would be the case for all analyzed criteria pollutants; therefore, the past, present, and future related projects would result in a significant cumulative air quality criteria pollutant impact and the Recommended Alternative's incremental contribution to that cumulatively significant impact would be cumulatively considerable. Mitigation measures **MM AQ-6** and **MM AQ-7** and LAHD's standard lease measures **LM AQ-1** and **LM AQ-2** would help reduce operational emissions; however, they would not reduce the Recommended Alternative's contribution below a cumulatively considerable level. Consequently, emissions from operation of the Recommended Alternative would produce cumulatively considerable and unavoidable contributions to a significant cumulative impact for NO_X, CO, and VOC.

Cumulative Impact AQ-4: The operation of the Recommended Alternative would produce emissions that cumulatively exceed an ambient air quality standard or substantially contribute to an existing or projected air quality standard violation—Cumulatively Considerable and Unavoidable

Operation of the Recommended Alternative would exceed the federal 1-hour NO_2, the 24-hour and annual PM_{10}, and the $PM_{2.5}$ ambient air thresholds. These impacts would combine with impacts from concurrent related projects, which would already be cumulatively significant. As a result, without mitigation, impacts from proposed project operations would make a cumulatively considerable contribution to an existing significant cumulative impact related to ambient NO_2, PM_{10}, and $PM_{2.5}$ levels.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the Recommended Alternative that avoid or substantially lessen the significant environmental

effect identified in the Final EIS/EIR. The implementation of mitigation measures **MM AQ-6** and **MM AQ-7** would help reduce cumulatively considerable operational emissions.

Although mitigation measures **MM AQ-6** and **MM AQ-7** would reduce the cumulative effect of operational emissions, the mitigation would not reduce cumulative impacts to a less-than-significant level. The Board hereby finds that specific economic, environmental, legal, social, technological, or other considerations make infeasible additional mitigation measures or proposed project alternatives identified in the Final EIS/EIR. The Recommended Alternative would make a cumulatively considerable contribution to an existing significant cumulative impact related to ambient NO_2, PM_{10}, and $PM_{2.5}$ levels.

Rationale for Finding

The emissions from cumulative projects would be cumulatively significant if their combined operational emissions would exceed the SCAQMD daily operational emission thresholds. This would be the case for all analyzed criteria pollutants; therefore, the past, present, and future related projects would result in a significant cumulative ambient air emissions impact. The Recommended Alternative's incremental contribution to that cumulatively significant impact would be cumulatively considerable. Mitigation measures **MM AQ-6** and **MM AQ-7** would help reduce operational emissions; however, they would not reduce the Recommended Alternative's contribution below a cumulatively considerable level. Consequently, emissions from operation of the Recommended Alternative would produce cumulatively considerable and unavoidable contributions to a significant cumulative for ambient NO_2, PM_{10}, and $PM_{2.5.}$ All mitigation measures determined feasible by LAHD as identified in the Final EIS/EIR have been incorporated into the Recommended Alternative.

Cumulative Impact AQ-7: The Recommended Alternative would exposure receptors to significant levels of toxic air contaminants (TACs) – Cumulatively Considerable and Unavoidable

Recommended Alternative construction and operation emissions of TACs would not increase cancer risks above the significance threshold for any receptor type relative to the baseline. The Recommended Alternative would also not result in increases in non-cancer risk in excess of the significance thresholds. Although Recommended Alternative cancer risk and population cancer burden would be below SCAQMD's project-level significance thresholds, the impacts would be greater than the future baseline and would combine with impacts from concurrent related projects and background risk levels, which would already be cumulatively significant. As a result, the Recommended Alternative would make a cumulatively considerable contribution to an existing significant cumulative impact for cancer risk and population cancer burden.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the Recommended Alternative that avoid or substantially lessen the significant environmental effect identified in the Final EIS/EIR. The implementation of mitigation measures **MM AQ-1** through **MM AQ-7** would help reduce cumulatively considerable exposure to significant TACs. Although mitigation measures **MM AQ-1** through **MM AQ-7** would reduce the cumulative effect of exposure to TACs, the mitigation would not sufficiently reduce the Recommended Alternative's cumulatively considerable contribution of the impact to a less-than-significant level. Therefore, the Board hereby finds that specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or project alternatives identified in the Final EIS/EIR. Even with the incorporation of feasible mitigation

measures, the Recommended Alternative would make a cumulatively considerable contribution to an existing significant cumulative impact for cancer risk.

Rationale for Finding

SCAQMD's Multiple Air Toxics Exposure Study (MATES IV) (SCAQMD, 2015) showed that the cancer risk in 2012 from toxic air contaminants was estimated at roughly 480 in a million in the San Pedro and Wilmington areas. In their *Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach*, the California Air Resources Board (CARB) estimated that elevated levels of cancer risks due to operational emissions from the Ports of Los Angeles and Long Beach occur within and in proximity to the two ports (CARB 2006). Based on this information, cancer risk from TAC emissions within the project region, and non-cancer impacts associated with past, present, and reasonably foreseeable projects in the proposed project area, are therefore cumulatively significant.

Implementation of proposed project mitigation measures that reduce diesel combustion and other TAC emissions, specifically mitigation measures **MM AQ-1** through **MM AQ-7**, would reduce TAC emissions from the Recommended Alternative. After implementation of these mitigation measures, although the overall emissions would be reduced, the Recommended Alternative would add to the TAC burden in the vicinity and result in a cumulatively considerable contribution to an existing cumulatively significant impact for cancer risk for marina-residential and occupational receptors. All mitigation measures determined feasible by LAHD as identified in the Final EIS/EIR have been incorporated into the Recommended Alternative.

3.3.6 Biological Resources

Cumulative Impact BIO-3: The Recommended Alternative would contribute to a cumulatively considerable disruption of local biological communities (e.g., from construction impacts or the introduction of noise, light, or invasive species)—Cumulatively Considerable and Unavoidable

Past, present, and future related projects have increased and will continue to increase vessel traffic; therefore, the related projects could potentially increase the chances for the introduction of invasive species via vessel hulls or ballast water which is considered to be a cumulatively considerable and unavoidable significant cumulative impact. The Recommended Alternative would contribute to this overall increase in vessel traffic, thereby adding to the cumulative potential for introduction of exotic species. Potential effects related to the introduction of non-native species have the potential to be cumulatively significant, and the Recommended Alternative could make a cumulatively considerable contribution to a significant cumulative impact related to the introduction of non-native species.

Finding

Due to the lack of a proven technology, no feasible mitigation beyond legal requirements is currently available to prevent introduction of invasive exotic species via vessel hulls or ballast water. Therefore, the Recommended Alternative would have a cumulatively considerable contribution to the significant cumulative impacts on biological resources related to the potential introduction of invasive exotic species.

Rationale for Finding

Cumulative biological resource impacts related to the introduction of invasive exotic species to Harbor waters would be significant and unavoidable from past, present, and reasonably foreseeable future projects, and the Recommended Alternative would make a cumulatively considerable contribution to a significant cumulative impact related to the introduction of non-native species. No feasible mitigation beyond legal requirements is currently available to entirely prevent introduction of invasive exotic species via vessel hulls or ballast water. Therefore, there is no way to prevent the Recommended Alternative's cumulatively considerable contribution to the significant cumulative impacts on biological resources related to the potential introduction of invasive exotic species. New technologies are being explored and, if methods become available in the future, they would be implemented as required at that time. Consequently, the Recommended Alternative would make a cumulatively considerable and unavoidable contribution to a significant cumulative impact on biological resources. All mitigation measures determined feasible by LAHD as identified in the Final EIS/EIR have been incorporated into the Recommended Alternative.

3.3.7 Cultural Resources

Cumulative Impact CR-1: The Recommended Alternative would have the potential to make a cumulatively considerable contribution to a significant cumulative impact on built environment historical resources—Cumulatively Considerable and Unavoidable

Past projects within urban settings including the Recommended Alternative area have involved demolition of architectural structures (some that could be now considered historic had they not been demolished). Although demolition of historic structures in the redevelopment area of the Project site is a project-specific impact, there are other historic structures within the project vicinity that have historical significance (i.e., locally significant for association with the development of the Port of Los Angeles). As a result, the contribution of the Recommended Alternative would make a cumulatively considerable contribution to a significant cumulative impact on built environment historic resources.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the Recommended Alternative that avoid or substantially lessen the significant environmental effect identified in the Final EIS/EIR. The implementation of mitigation measures **MM CR-1** would help reduce cumulatively considerable impacts on built environment historic resources. Although mitigation measure **MM CR-1** would reduce the cumulative effect, the mitigation would not sufficiently reduce the Recommended Alternative's cumulatively considerable contribution to a less-than-significant level. The Board hereby finds that specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or proposed project alternatives identified in the Final EIS/EIR. Even with the incorporation of feasible mitigation measures, the Recommended Alternative would make a cumulatively considerable contribution to a significant cumulative impact on built environment historic resources.

Rationale for Finding

Cumulative impacts associated with past, present, and reasonably foreseeable future projects regarding historical architectural resources could be cumulatively significant if they include the removal of significant or potentially significant historical architectural resources. Mitigation

measures **MM CR-1** would help reduce impacts to historical architectural resources, but not to a level of less than significant. Consequently, the Recommended Alternative would make a cumulatively considerable and unavoidable contribution to historical architectural resources. All mitigation measures determined feasible by LAHD as identified in the Final EIS/EIR have been incorporated into the Recommended Alternative.

3.3.8 Greenhouse Gases

Cumulative Impact GHG-1: The Recommended Alternative would generate GHG that would exceed the SCAQMD threshold—Cumulatively Considerable and Unavoidable

Past, present, and reasonably foreseeable future projects in the area have generated and will continue to generate GHGs from the combustion of fossil fuels and the use of refrigerants, and other products. Current and future projects will incorporate a variety of GHG reduction measures in response to federal, state, and local mandates and initiatives, and these measures are expected to reduce GHG emissions from future projects. However, because of the long-lived nature of GHGs in the atmosphere and the global nature of GHG emissions impacts, no specific quantitative level of GHG emissions from related projects in the region or state-wide has been identified below which no impacts would occur. It is therefore conservatively assumed that related projects represent a significant cumulative impact.

Recommended Alternative impacts would combine with impacts from related projects, which would already be cumulatively significant. As a result, without mitigation, impacts from Recommended Alternative construction and operation would make a cumulatively considerable contribution to an existing significant cumulative impact related to GHG and global climate change under CEQA.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the Recommended Alternative that avoid or substantially lessen the significant environmental effect identified in the Final EIS/EIR. The implementation of mitigation measures **MM AQ-2, MM AQ-6, MM AQ-7, MM GHG-1,** and **MM GHG-2** would help reduce cumulatively considerable GHG emissions. Furthermore, LAHD's standard lease measures **LM AQ-1, LM AQ-2,** and **LM GHG-1** would be included in the tenant lease. These measures would further reduce future GHG emissions. Although mitigation measures **MM AQ-2, MM AQ-6, MM AQ-7, MM GHG-1,** and **MM GHG-2** and lease measures **LM AQ-1, LM AQ-2,** and **LM GHG-1** would reduce the cumulative GHG emissions, the mitigation would not sufficiently reduce the Recommended Alternative's cumulatively considerable contribution of the impact to a less-than-significant level. The Board hereby finds that specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or proposed project alternatives identified in the Final EIS/EIR. Even with the incorporation of feasible mitigation measures, the Recommended Alternative would make a cumulatively considerable contribution to a significant cumulative impact

Rationale for Finding

The challenge in assessing the significance of an individual project's contribution to global GHG emissions and associated global climate change impacts is determining whether a project's GHG emissions, which are at a micro-scale relative to global emissions, result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale

impact. The Recommended Alternative would produce GHG emissions that would exceed SCAQMD significance thresholds for GHG and would therefore result in significant GHG impacts. Proposed project impacts would combine with impacts from related projects and add additional burden to existing cumulatively significant GHG impacts, thereby resulting in cumulatively considerable contributions to GHG impacts. Mitigation measures **MM AQ-2, MM AQ-6, MM AQ-7, MM GHG-1,** and **MM GHG-2** and lease measures **LM AQ-1, LM AQ-2,** and **LM GHG-1** would help reduce GHG emissions; however, they would not reduce impacts to a less-than-significant level and the Recommended Alternative would make a cumulatively considerable contribution to a significant cumulative impact. All feasible by LAHD as identified in the Final EIS/EIR have been incorporated into the Recommended Alternative.

3.3.9 Ground Transportation

Cumulative Impact TRANS-2: The Recommended Alternative operations would not result in a cumulatively considerable long-term impact at study location intersection volume/capacity ratios or level of service—Cumulatively Considerable

Increases in traffic volumes on the surrounding roadways due to cumulative projects would result in a cumulative effect on the operating conditions of area intersections and roadways. Cumulative projects would cause significant cumulative impacts at these five study intersections. The Recommended Alternative would result in an increase in the V/C ratio at a number of study locations. However, the amount of Recommended Alternative-related traffic that would be added at the study intersection locations would not be of sufficient magnitude to meet or exceed any of the thresholds of significance at all but one intersection. Based on the comparison of the Project-related scenarios to the cumulative baseline scenarios, the Recommended Alternative would make a cumulatively considerable contribution to a significant cumulative impact at study Intersection #14: Ferry Street at SR-47 (Terminal Island Freeway)/Seaside Ave Ramps in 2026 and 2038.

Finding

Intersection #14 is controlled by Caltrans, and is outside of the Port's/LAHD's jurisdiction. No mitigation within the LAHD's control is available to reduce the Project-level operational traffic impact at Intersection #14 or the cumulatively considerable contributions to a significant cumulative impact for the Recommended Alternative. Therefore, the Board hereby finds that specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or proposed project alternatives identified in the Final EIS/EIR. The Recommended Alternative would make a cumulatively considerable contribution to a significant cumulative impact at study Intersection #14: Ferry Street at SR-47 (Terminal Island Freeway)/Seaside Ave Ramps.

Rationale for Findings

Cumulative ground transportation impacts related to the increase in traffic volumes would be significant and unavoidable from part, present, and reasonably foreseeable future projects, and the Recommended Alternative would make a cumulatively considerable contribution to this increase in traffic volumes at study Intersection #14: Ferry Street at SR-47 (Terminal Island Freeway)/Seaside Ave Ramps.

Because Intersection #14 is controlled by Caltrans, no feasible mitigation is within the LAHD's control is available to reduce the project-level operational traffic impact at Intersection #14 or the cumulatively considerable contributions to a significant cumulative impact for the Recommended Alternative. Therefore, there is no way to prevent the Recommended Alternative's cumulatively considerable contribution to the significant cumulative impacts on ground transportation related to the increase in traffic volumes. Consequently, the Recommended Alternative would make a cumulatively considerable and unavoidable contribution to a significant cumulative impact on ground transportation. All mitigation measures determined feasible by LAHD as identified in the Final EIS/EIR have been incorporated into the Recommended Alternative.

3.3.10 Noise

Cumulative Impact NOI-1: Construction activities lasting more than 10 days in a 3-month period would result in a cumulatively considerable exceedance in existing ambient exterior noise levels by 5 dBA or more at noise-sensitive receptors—Cumulatively Considerable and Unavoidable

Noise produced by daytime pile driving during wharf construction alone or pile driving in combination with general construction has been identified as having a significant impact at Fish Harbor and at San Pedro waterfront commercial- and tourism-based uses. Therefore, during pile driving, the Recommended Alternative would have a cumulatively considerable noise impact when combined with any other project that would affect the same receptor locations and occur concurrently with the Recommended Alternative.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the Recommended Alternative that avoid or substantially lessen the significant environmental effect identified in the Final EIS/EIR. The implementation of mitigation measures **MM NOI-1** and **MM NOI-2** would help reduce cumulatively considerable impacts from construction noise. Although mitigation measures **MM NOI-1** and **MM NOI-2** would reduce the maximum noise levels during proposed project construction to a less-than-significant level, the Recommended Alternative could still contribute considerably to a cumulatively significant impact related to noise from pile driving. The Board hereby finds that specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or proposed project alternatives identified in the Final EIS/EIR. Even with the incorporation of feasible mitigation measures and the reduction of significant project-level noise impacts to a less-than-significant level, the Recommended Alternative would make a cumulatively considerable contribution to a significant cumulative impact if other construction projects occur concurrently.

Rationale for Findings

Construction of the Recommended Alternative independent of any other project would cause a significant noise impact on sensitive receptors at Fish Harbor and the San Pedro waterfront commercial- and tourism-based uses.

Noise produced by daytime pile driving during wharf construction alone or pile driving in combination with general construction would increase average ambient noise levels at Fish Harbor by up to 6 dBA and at San Pedro waterfront commercial- and tourism-based uses by 8 dBA over existing levels. Mitigation measures **MM NOI-1** and **MM NOI-2** would reduce

project- related noise impacts to a less-than-significant level. However, noise from the other construction projects in the project vicinity could increase noise levels in the area. Taking into consideration the location and scope of other projects, incremental noise increases from construction would exceed the 5-dBA significance threshold. Therefore, the Recommended Alternative would make a cumulatively considerable contribution to a significant cumulative impact when combined with past, present, and reasonably foreseeable future projects. All mitigation measures determined feasible by LAHD as identified in the Final EIS/EIR have been incorporated into the Recommended Alternative.

Chapter 4
The Proposed Project and Alternatives

Eight alternatives, including the proposed Project, the No Federal Action Alternative, and No Project Alternative, were considered and evaluated in regards to how well each could feasibly meet the basic project objectives and avoid or substantially lessen any of the significant effects of the project. Two of these alternatives were eliminated from detailed consideration either because they could not feasibly meet the basic objectives of the project and/or because they would not avoid or substantially lessen any of the significant effects of the project, as discussed in Section 2.9.2. Six of the alternatives (including the proposed Project and then Recommended Alternative) were carried forward for further analysis to determine whether they could feasibly meet most of the project objectives but avoid or substantially lessen any of the significant effects of the project. These six alternatives are evaluated co-equally with the proposed Project for all environmental resources in Chapter 3 in the Draft EIS/EIR. Chapter 6 of the Draft EIS/EIR compares the proposed Project and these five alternatives and identifies the environmentally preferred and environmentally superior alternative. The six alternatives that were carried through the analysis of impacts in Chapter 3:

- Proposed Project
- Alternative 1 – No Federal Action
- Alternative 2 – No Project
- Alternative 3 – Reduced Project: Reduced Wharf Improvements
- Alternative 4 – Reduced Project: No Backland Improvements
- Alternative 5 – Expanded On-Dock Railyard: Wharf and Backland Improvements with an Expanded Terminal Island Container Transfer Facility (TICTF) (Recommended Alternative)

4.1 Reasonable Range of Alternatives

Lead agencies are required to evaluate a "reasonable range" of alternatives but are not required to evaluate every possible alternative: "an EIR need not consider every conceivable alternative to a project" (State CEQA Guidelines Section 15126.6(a)). The "range of alternatives required in an EIR is governed by a 'rule of reason' that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice" (State CEQA Guidelines Section 15126.6(f)). The Draft EIS/EIR contained five alternatives (not including the proposed Project), discussed in Chapter 6 of the Draft EIS/EIR and shown in Table 4 below. This table compares the major features of the proposed Project to those for the alternatives. The five alternatives plus the proposed Project constitute a reasonable range of alternatives, which permits the decision makers to make a reasoned choice regarding proposed project approval (or

approval of one of its alternatives), approval with modifications, or disapproval. Furthermore, CEQA does not require an EIR to consider multiple variations on the alternatives analyzed in the Draft EIR. "What is required is the production of information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned" (Village Laguna of Laguna Beach, Inc. v. Board of Supervisors of Orange County (1982) 134 Cal.App.3d 1022).

Table 4: Summary of Proposed Project and Alternatives

	Proposed Project (2038)	Alt. 1: No Federal Action (2038)	Alt. 2: No Project (2038)	Alt. 3: Reduced Wharf (2038)	Alt 4: No Backland Improvements (2038)	Alt 5: Expanded On-Dock Railyard (2038)
Annual TEUs	2,379,525	1,818,000	1,818,000	2,250,000	2,115,133	2,379,525
Annual Peel-Off Yard Throughput[1]	129,525	None	None	None	115,133	129,525
Terminal Acreage	229	229	205	229	205	229
Annual Ship Calls[2]	208	208	208	208	208	208
24-hour Peak Day Ship Calls	2	2	2	2	2	2
Average Daily Truck Trips (peak month)	7,028	4,815	4,815	6,516	5,985	6,818
Average Daily Train Trips (peak month)	5.5[3]	4.2	4.2	5.2	4.9	5.5[3]
Operating Cranes	13	8	8	13	13	13
Total Dredging (cy)	38,000	0	0	30,000	38,000	38,000
Maximum Vessel Size						
Berths 226-229	16,000	8,000	8,000	16,000	16,000	16,000
Berths 230-232	10,000	8,000	8,000	8,000	10,000	10,000

Note: [1] Peel-off yards serve as off-site backlands to the terminal. Peel-off yard throughput is included in the total annual throughput for the proposed Project and alternatives that are not berth-constrained.

[2] Although various alternatives handle different throughout, the vessel calls are the same because of vessel strings, which is described in Chapter 1, Section 1.2.2.3.

[3] Although the proposed Project and Alternative 5 have the same average daily train trips (during the peak month), there is a difference between the number of on-dock and off-dock trains.

4.2 Alternatives Eliminated from Further Consideration

Alternatives that are remote or speculative, or the effects of which cannot be reasonably ascertained, need not be considered (CEQA Guidelines, Section 15126.6(f)(3)). Alternatives may be eliminated from detailed consideration in an EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects (CEQA Guidelines, Section 15126.6(c)). The following alternatives were determined to be infeasible and were eliminated from further consideration in the Draft EIS/EIR (additional details regarding reasons for rejection are included in Section 2.9.2 of the Draft EIS/EIR):

- Use of West Coast Ports Outside Southern California
- Other Sites in the Port Complex

4.3 Alternatives Analyzed in the EIS/EIR

Chapter 6 of the Draft EIS/EIR contains a detailed comparative analysis of the alternatives that were required per CEQA (No Project Alternative), required per NEPA (No Federal Action Alternative), or were found to achieve most of the proposed project objectives, are considered ostensibly feasible, and may reduce environmental impacts associated with the proposed Project.

A summary of the impact analysis for the proposed Project and the alternatives is shown in Table 5 below, which identifies the resource areas where the proposed Project or alternative would result in an unavoidable significant impact, as discussed in resource analyses in Chapter 3 of the Draft EIS/EIR. The table also presents the resource areas that would have significant impacts mitigated to less-than-significant levels. Detailed discussions of these resources are provided in Chapter 6 of the Draft EIS/EIR.[1] As shown in Table 5, the proposed Project, Recommended Alternative (Alternative 5) and all other alternatives would have significant unavoidable impacts in the areas of air quality and meteorology, biological resources, and GHG emissions. As detailed in the Final EIS/EIR, modifications have been made to the Draft EIS/EIR (see modifications made to Appendix B.1 in Chapter 3 Section 3.2.9 of the Final EIS/EIR). As a result of the modifications, impacts for NOx were determined to be below SCAQMD thresholds in 2033 and 2038 prior to mitigation, however impacts for NOx in 2019 remain significant.

Table 5: Summary of CEQA Significance Analysis by Alternative

Environmental Resource Area	Proposed Project	Alternative				
		1	2	3	4	5
Air Quality and Meteorology	S	S	S	S	S	S
Biological Resources	S	S	S	S	S	S
Cultural Resources	S	S	N	S	L	S
Greenhouse Gas Emissions	S	S	S	S	S	S
Noise	M	L	L	M	M	M

Notes:
The analysis includes project-level impacts, not cumulative effects.
S = Unavoidable significant impacts
M = Significant but mitigable impact
L = Less than significant impact (not significant)
N = No impact

4.4 Environmentally Superior Alternative

As shown in Table 5, Alternative 2 would have the fewest impacts because it would create the fewest adverse impacts, including avoiding significant unavoidable impacts on cultural resources. Further, under the No Project Alternative, no construction would occur and impacts on air quality, biological resources, GHG emissions, and noise would be reduced in comparison to the Recommended Alternative. Therefore, Alternative 2 is deemed to be environmentally superior. However, none of the proposed project objectives would be met.

State CEQA Guidelines Section 15126.6(e)(2) requires that in cases where the No Project Alternative is determined to be the environmentally superior alternative, another alternative must also be identified as environmentally superior. As shown on Table 5, besides Alternative 2, Alternative 4 has the least significant environmental impact compared to the Recommended Alternative. because it would avoid a significant unavoidable impact on cultural resources. Therefore, in accordance with CEQA, Alternative 4 is deemed to be the environmentally superior alternative. Alternative 4 would include berth deepening, crane raising, and new cranes, which would increase the berth capacity by increasing container loading and unloading efficiency and allowing it to accommodate larger vessels. However, this alternative would not include backlands expansion that is needed to balance the added capacity of the waterside improvements. Because of this, the terminal under Alternative 4 would be backland-constrained, which would limit the terminal's overall capacity and thus, Alternative 4 would not meet the project objectives as well as the Recommended Alternative.

4.5 CEQA Findings for Adoption of Alternative 5 in Lieu of the Originally Proposed Project

Alternative 5 is the Recommended Alternative for adoption in lieu of the originally proposed Project. Alternative 5 includes the same improvements to Berths 226-229, Berths 230-232, and backland improvements as the proposed Project, and would include one additional rail track at the TICTF.

Under the Recommended Alternative there would be two operating berths after construction, and the same amount of dredging as the proposed Project. The Recommended Alternative would also accommodate the largest vessels (16,000 TEUs) at Berths 226-229, and the new design depth at Berths 230-232 would be capable of handling vessels up to 10,000 TEUs. Based on the throughput projections, as with the originally proposed Project, the Recommended Alternative is expected to operate at a capacity of approximately 2,379,525 TEUs by 2038. As with the proposed Project, 208 vessels are anticipated to call on the terminal by 2038 under the Recommended Alternative. Additionally, the Recommended Alternative would have the same number of operating berths and would result in a maximum of two ship calls (over a 24-hour period).

Throughput projections estimate that the capacity of the existing terminal (1,818,000 TEUs) is expected to be reached by 2033 and be maintained through 2038. The Recommended Alternative would increase the throughput capacity of the Everport Container Terminal to 2,379,525 TEUs annually, an increase of approximately 1.14 million TEUs over 2013 existing conditions. The Recommended Alternative would also result in 208 annual vessel calls, which is 42 more than the vessel calls in 2013.

Under the Recommended Alternative, the volume of cargo passing through the Everport Container Terminal's portion of the TICTF on-dock railyard is projected to increase from 230,227 TEUs in 2013 to 606,341 TEUs through 2038. The Everport Container Terminal's 2038 throughput is projected to result in an annual average of 5.0 trains per day, and an average of 5.6 trains per day during the peak month. The Recommended Alternative would increase the capacity of the Everport portion of TICTF from 606,341 TEUs annually to 659,841 TEUs.

Finding

The Board hereby finds that the Recommended Alternative is more desirable than the proposed Project because it would better support the Port's overall goal to expand the use and capacity of on-dock rail to both move goods more efficiently and reduce traffic and emissions associated with truck trips. The Recommended Alternative would therefore result in reduced environmental impacts (particularly to traffic and air quality) as compared to the proposed Project. Although the proposed Project would have slightly less construction emissions as compared to the Recommended Alternative, the originally proposed Project would also result in higher NOx and PM emissions from operations in 2030 and 2038, and greater greenhouse gas emissions, due, in part, to more truck trips and length of truck trips from a reduced use of on-dock rail, as would otherwise occur under the Recommended Alternative.

Facts in Support of the Finding

The proposed Project would result in similar environmental impacts to the Recommended Alternative because its operational capacity would be the same, although construction emissions would be slightly reduced and operational air quality and greenhouse emissions

would be slightly greater. The proposed Project is less desirable than the Recommended Alternative which would expand the on-dock rail capacity and better support the project objective of promoting the long-term development of the Port.

4.6 CEQA Findings for Alternatives Analyzed

4.6.1 Alternative 1 – No Federal Action

Alternative 1 is a NEPA-required no action alternative and represents the NEPA baseline. Under the No Federal Action Alternative, only activities that could occur absent a U.S. Army Corps of Engineers (USACE) permit would be allowed. Absent a USACE permit, no dredging, dredged material disposal, in-water pile installation, or raised and new crane installation would occur. The existing terminal's ability to handle larger ships would be facilitated by activities that require a USACE permit (dredging, in-water pile driving, and raised and new cranes). Therefore, without the activities that address the capacity constraints of the terminal's berths (which would allow the terminal to service larger ships), the existing terminal capacity would not be increased. The No Federal Action Alternative includes additional backlands (addition of the 1.5-acre and 22-acre expansion areas) to improve efficiency; however, the additional backland area would not change the throughput capacity of the existing terminal.

Finding

The Board hereby finds that although Alternative 1—No Federal Action would result in reduced environmental impacts compared to the Recommended Alternative, this alternative would not increase the capacity of the terminal, and thus it would not meet the underlying fundamental purpose and objective of the project - to optimize the container-handling efficiency and capacity of the Port to accommodate the projected fleet mix of larger container vessels (up to 16,000 TEUs) that are anticipated to call at the Everport Container Terminal through 2038. As a result, the Board finds that Alternative 1—No Federal Action is not a feasible alternative to the Recommended Alternative because it would not accomplish the fundamental project purpose and objective.

Facts in Support of the Finding

The No Federal Action Alternative would result in reduced environmental impacts in the resource areas related to air quality, biological resources, GHG emissions, and noise as compared to the Recommended Alternative because this alternative would not include no dredging, dredged material disposal, in-water pile installation, or raised and new crane installation. Although the No Federal Action Alternative would result in reduced environmental impacts, it would not meet the underlying fundamental purpose and objective of the project to optimize the container-handling efficiency and capacity of the Port to accommodate the projected fleet mix of larger container vessels. Accordingly, the Board finds that Alternative 2—No Federal Action is not a feasible alternative to the Recommended Alternative because it would not fully accomplish fundamental project goals and objectives.

4.6.2 Alternative 2 – No Project

Under Alternative 2, none of the proposed construction activities would occur in water or in water-side or backland areas. LAHD would not implement any terminal improvements or increases in backland acreage. Raising of cranes would not occur, no new cranes would be added, and no dredging would occur. The current lease that expires in 2028 has an option for a ten-year extension, which would mean the existing terminal could operate through 2038.

Under the No Project Alternative, the existing Everport Container Terminal would continue to operate as an approximately 205-acre container terminal. Based on the throughput projections for the Port, the Everport Container Terminal is expected to operate at its existing capacity of approximately 1,818,000 TEUs by 2038 and require 208 annual vessel calls.

Finding

The Board hereby finds that although Alternative 2 – No Project would not feasibly meet the underlying fundamental purpose and any of the Recommended Alternative objectives and, on that basis, rejects the No Project Alternative. While Alternative 2 would result in reduced environmental impacts compared to the Recommended Alternative, this alternative would not result in the implementation of any terminal improvements or increases in backland acreage, and thus, would not meet the underlying fundamental purpose and objective of the project to optimize the container-handling efficiency and capacity of the Port to accommodate the projected fleet mix of larger container vessels that are anticipated to call at the Everport Container Terminal through 2038. As a result, the Board finds that Alternative 2 – No Project is not a feasible alternative to the Recommended Alternative because it would not accomplish the fundamental project goals and objectives.

Facts in Support of the Finding

The No Project Alternative would result in reduced environmental impacts in the resource areas related to air quality, biological resources, GHG emissions, cultural resources, and noise as compared to the Recommended Alternative because this alternative would not implement any terminal improvements or increase backlands acreage. Although the No Project Alternative would result in reduced environmental impacts, it would not deepen the berths, raise and add new larger cranes, or improve backlands, which are necessary to increase container loading and unloading efficiency and accommodate larger vessels. In addition, Alternative 2 would not accommodate the long-term development and growth of the Port. Accordingly, the Board finds that the No Project Alternative is not a feasible alternative to the Recommended Alternative because it would not accomplish fundamental project goals and objectives.

4.6.3 Alternative 3 – Reduced Project: Reduced Wharf Improvements

Alternative 3 would involve slightly less construction than the Recommended Alternative but would result in a slightly reduced operational throughput capacity compared to the Recommended Alternative. Alternative 3, would deepen Berths 226-229 and expand the backlands by 23.5 acres. Under Alternative 3, there would be two operating berths after construction, similar to the Recommended Alternative, but Berths 230-232 would remain at their existing depth (-45’ MLLW). This alternative would require less dredging (by approximately 8,000 cubic yards) and sheet pile driving than the Recommended Alternative. Based on the throughput projections, this alternative is expected to operate at its capacity of 2,250,000 TEUs by 2038. This alternative would accommodate the largest vessels (16,000 TEUs) at Berths 226-229. The existing design depth that remains at Berths 230-232 would only be capable of handling vessels up to 8,000 TEUs. While the terminal could handle greater throughput than the No Project and No Federal Action alternatives, this reduced project alternative would not achieve the same level of operational efficiency as achieved by the Recommended Alternative, because it would only accommodate the larger vessels at one wharf location compared to two wharf locations under the Recommended Alternative. Under this alternative, 208 vessels would call on the terminal by 2038, the same as for the Recommended Alternative. Additionally, because this alternative would have the same number of operating

berths as the Recommended Alternative, this alternative would result in a maximum of two ship calls (over a 24-hour period), the same as for the Recommended Alternative.

Under Alternative 3, the terminal's 2038 throughput is projected to result in an annual average of 4.7 trains per day, and an average of 5.2 trains per day during the peak month. This alternative would also result in 6,516 average daily truck trips during the peak month. The volume of cargo passing through the Everport Container Terminal's portion of the TICTF on-dock railyard is projected to increase from 230,227 TEUs in 2013 to 606,341 TEUs through 2038. The existing TICTF under Alternative 3 is projected to have sufficient capacity to handle the full amount of anticipated demand for on-dock rail facilities associated with the maximum terminal throughput of 2,250,000 TEUs.

Finding

The Board hereby finds that Alternative 3 – Reduced Project: Reduced Wharf Improvements would not maximize container-handling capacity and efficiency at the proposed project site and would not make the best use of the proposed project site. Therefore, Alternative 3 would not fully meet the underlying fundamental purpose and objective of the project - to optimize the container-handling efficiency and capacity of the Port to accommodate the projected fleet mix of larger container vessels (up to 16,000 TEUs) that are anticipated to call at the Everport Container Terminal through 2038. The impact determinations are the same as the Recommended Alternative, although Alternative 3 would result in slightly less criteria pollutant and GHG emissions and less pile driving noise impacts. However, the Board finds that Alternative 3 is not a feasible alternative to the Recommended Alternative because it would not accomplish the fundamental project goals and objectives.

Facts in Support of the Finding

Alternative 3 has the same impact determinations as the Recommended Alternative. Although, Alternative 3 would results in slightly less criteria pollutant and GHG emissions than, which in turn would result in a slightly less impacts to air quality than the Recommended Alternative. In addition, Alternative 3 would result in less pile driving noise impacts than the Recommended Alternative. However, it would not maximize container-handling capacity and efficiency at the proposed project site and would not make the best use of the project site. Therefore, Alternative 3 would not optimize the container-handling efficiency and capacity of the Port to accommodate the projected fleet mix of larger container vessels (up to 16,000 TEUs) that are anticipated to call at the Everport Container Terminal through 2038. Thus, the Board finds that Alternative 3 – Reduced Project: Reduced Wharf Improvements is not a feasible alternative to the Recommended Alternative because it would not accomplish the fundamental project goals and objectives.

4.6.4 Alternative 4 – Reduced Project: No Backlands Improvements

Alternative 4 would deepen both operating berths at the terminal but would not increase backlands, which would limit the terminals ultimate throughput capacity compared to the Recommended Alternative.

Under this alternative, there would be two operating berths after construction, similar to the Recommended Alternative. This alternative would require the same dredging as the Recommended Alternative. This alternative would accommodate the largest vessels (16,000 TEUs) at Berths 226-229. The new design depth at Berths 230-232 would be capable of

handling vessels up to 10,000 TEUs. Based on the throughput projections, this alternative is expected to operate at its capacity of approximately 2,115,133 TEUs by 2038, which is less than the Recommended Alternative. Under this reduced project alternative, the container terminal would not improve or relocate the gate complex and would not result in any development on the 22-acre backlands expansion area (and would therefore not affect the former Canner's Steam Company Plant or archaeological resources); however, this alternative would handle a lower level of cargo throughput (up to 264,392 TEUs) than the Recommended Alternative. Under this alternative, 208 vessels would call on the terminal by 2038, the same as for the Recommended Alternative. Additionally, because this alternative would have the same number of operating berths as the Recommended Alternative, this alternative would result in a maximum of two ship calls (over a 24-hour period), the same as for the Recommended Alternative.

Under Alternative 4, the terminal's 2038 throughput is projected to result in an annual average of 4.4 trains per day, and an average of 4.9 trains per day during the peak month. This alternative would also result in 5,985 average daily truck trips during the peak month. The volume of cargo passing through the Everport Container Terminal's portion of the TICTF on-dock railyard is projected to increase from 230,227 TEUs in 2013 to 606,341 TEUs through 2038. The existing TICTF under Alternative 4 is projected to have sufficient capacity to handle the full amount of anticipated demand for on-dock rail facilities associated with the maximum terminal throughput of 2,115,133 TEUs.

Finding

The Board hereby finds that Alternative 4 – Reduced Project: No Backlands Improvements would not maximize container-handling capacity and efficiency at the proposed project site. Alternative 4 would be environmentally superior to the Recommended Alternative as it would avoid a significant unavoidable impact to cultural resources and would have slightly reduced criteria pollutant and GHG emissions. However, Alternative 4 would be backland-constrained, which would limit the terminal's overall capacity, and would not fully utilize the berth improvements. Alternative 4 would have the lowest throughput capacity (2,115,133 TEUs) compared to the other alternatives that include berth deepening, crane raising, new cranes, and backland expansion (2,379,525 TEUs for the Recommended Alternative and Alternative 5, and 2,250,000 TEUs for Alternative 3). Because it would have lower throughput and not fully utilize the berth improvements, Alternative 4 would not optimize the terminal and thus, would not meet the project objectives as well as the Recommended Alternative. Therefore, the Board finds that Alternative 4 is not a feasible alternative to the Recommended Alternative because it would not accomplish the fundamental goals and objectives of the Recommended Alternative.

Facts in Support of the Finding

Alternative 4 would be environmentally superior to the Recommended Alternative because it would avoid a significant unavoidable impact to cultural resources and would have slightly reduced criteria pollutant and GHG emissions. However, it would be backlands constrained and thus would limit the terminal's overall capacity. Thus, Alternative 4 would have a lower throughput and would not and not fully utilize the berth improvements. Alternative 4 – Reduced Project: No Backlands Improvements would not optimize the container-handling efficiency and capacity of the Port and thus it is not a feasible alternative to the Recommended Alternative because it would not fully accomplish fundamental project goals and objectives.

4.6.5 Alternative 5 – Expanded On-Dock Railyard: Wharf and Backland Improvements with an expanded TICTF (Recommended Alternative)

The Recommended Alternative (Alternative 5) would be the same as the proposed Project and include improvements to Berths 226-229, Berths 230-232, backland improvements, but also with an extra track at TICTF.

Under the Recommended Alternative, there would be two operating berths after construction, the same as the proposed Project. This alternative would require the same dredging as the proposed Project. This alternative would accommodate the largest vessels (16,000 TEUs) at Berths 226-229. The new design depth at Berths 230-232 would be capable of handling vessels up to 10,000 TEUs. Based on the throughput projections, the Recommended Alternative is expected to operate at its capacity of approximately 2,379,525 TEUs by 2038, the same as the proposed Project. Under this alternative, 208 vessels would call on the terminal by 2038, the same as the proposed Project. Additionally, because the Recommended Alternative would have the same number of operating berths as the proposed Project, the Recommended Alternative would result in a maximum of two ship calls (over a 24-hour period), the same as for the proposed Project.

Under the Recommended Alternative, the terminal's 2038 throughput is projected to result in an annual average of 4.9 trains per day, and an average of 5.5 trains per day during the peak month. This alternative would also result in 6,818 average daily truck trips during the peak month. The terminal would have added capacity at the TICTF and be able to transport a greater number of containers via rail than the proposed Project (the additional rail at the TICTF would increase its capacity from 606,341 TEUs to 659,841 TEUs). Under the Recommended Alternative, the volume of cargo passing through the Everport Container Terminal's portion of the TICTF on-dock railyard is projected to increase from 230,227 TEUs in 2013 to 659,841 TEUs through 2038. The Recommended Alternative represents a decrease in truck trips with no additional air quality impacts to criteria pollutants. Alternative 5 has higher construction costs associated with it than the originally proposed Project but it still meets the objectives of the project with lower traffic emissions and truck trips. The improved TICTF under Alternative 5 is projected to have sufficient capacity to handle the full amount of anticipated demand for on-dock rail facilities associated with the maximum terminal throughput of 2,379,525 TEUs.

Finding

The Board hereby finds that Alternative 5 would not result in substantially reduced environmental impacts compared to the proposed Project, and would not eliminate any significant and unavoidable impact of the proposed Project. Alternative 5 would meet the project goals and objectives, and would have reduced truck trips with the increased use of on-dock rail. Although construction emissions increase slightly under Alternative 5, emissions of NOx, PM, and greenhouse gases decrease operationally in 2033 and 2038 due to the truck emission decreases. Alternative 5 was recommended by several commenters during the public comment period on the Draft EIR/EIS. It was not originally recommended by LAHD as the proposed Project due to its higher construction costs; however, LAHD now finds that the long-term environmental benefits outweigh the higher initial capital expenditure and have chosen this Alternative as the preferred project (Recommended Alternative).

Facts in Support of the Finding

Alternative 5 would result in the same operational throughput capacity as the proposed Project and would meet the basic project objectives as well as the fundamental purpose of the project. Because it would also increase the capacity of the TICTF, it would allow for increased transport of containers via on-dock rail, which would reduce the number of truck trips, relative to the proposed Project.

Alternative 5 would result in similar environmental impacts to the proposed Project because its operational capacity would be the same. However, it would have fewer operational heavy-duty truck trips, resulting in slightly less operational emissions of NOx, PM, and greenhouse gases than the proposed Project towards the end of the lease term. Further, although no significant traffic impacts would occur, Alternative 5 would reduce the number of vehicle trips as compared to the proposed Project. Given the project purpose and objectives, Alternative 5 would support the projected increase in throughput demand and would also make efficient use of the terminal area. As a result, the project objectives could be accomplished by Alternative 5 as well as with the proposed Project. In response to public input and the long-term environmental benefit of reduced heavy-duty truck trips, Alternative 5 meets the objectives of the project and is a means of reducing or avoiding some of the project's adverse environmental impacts.

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Chapter 5
Findings Regarding Irreversible Environmental Changes

Irreversible and irretrievable environmental changes caused by a project include uses of nonrenewable resources during construction and operation, long-term or permanent access to previously inaccessible areas, and irreversible damages that may result from project-related accidents.

Finding and Rationale

The Recommended Alternative would require the use of nonrenewable resources to develop the site for Port-related activities. Fossil fuels and energy would be consumed during both the construction and the operational phases. These energy resources would for the most part be irretrievable, and would cause irreversible changes in supplies of fossil fuel available for other uses. However, some electricity provided by Southern California Edison and the Los Angeles Department of Water and Power is provided from renewable sources and recently adopted legislation raises California's renewable portfolio requirements for retail electricity sales.

Non-recoverable material resources committed to the Recommended Alternative other than fossil fuels would include: capital, labor, and construction materials such as rock, steel, concrete, and timber. Non-recoverable materials would be used during construction and operational activities, but the amounts needed would be accommodated by existing supplies. Although the increase in the amount of materials used would be limited, they would be unavailable for other uses. The irreversible changes discussed above are justified by the increased efficiency in cargo handling at the Port that the Recommended Alternative would provide.

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Chapter 6
Changes to the Draft EIS/EIR

Changes were made to the Draft EIS/EIR following the public review period. Actual changes to the text can be found in Chapter 3, Modifications to the Draft EIS/EIR, of the Final EIS/EIR. Changes are identified by text strikeout and underline. Changes to the Draft EIS/EIR include:

- Modifications to mitigation measures in Section 3.2, Air Quality and Meteorology, Section 3.3, Biological Resources, and Section 3.10, Noise
- Modifications to operational emissions
- Modifications to GHG emissions
- Modifications to ground transportation tables
- Removal of reference to groundwater and soils having less than significant impacts with mitigation from Chapter 6, Comparison of Alternatives
- Minor text edits to Appendix F.2
- Additional Appendix - Investigation of 2033 HRA Start Year for the Everport Container Terminal Improvements Project

Finding and Rationale – Recirculation

Many comments on the EIR/EIS urged the Board of Harbor Commissioners to recirculate some or all of the EIR/EIS for a second time. CEQA requires a lead agency to recirculate an EIR only when "significant new information" is added to the EIR after public notice is given of the availability of the draft EIR for public review but before certification. (CEQA Guidelines Section 15088.5(a).)

Although the Final EIR includes new information and clarification, generated in response to comments received on the Draft EIS/EIR, the information is not significant new information requiring recirculation. For instance, no new information was included that would result in: (1) A new significant environmental impact resulting from the project or from a new mitigation measure proposed to be implemented; (2) A substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance; and/or (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed were added that would clearly lessen the environmental impacts of the project. (CEQA Guidelines Section 15088.5(a).)

All information included in the Final EIR/EIS, including the additional energy information merely clarifies or amplifies or makes insignificant modifications to the EIR/EIS. (See *Laurel Heights Improvement Association v. Regents of University of California* (*Laurel Heights II*) (1993) 6 Cal.4th 1112, 1129-1130.) Although, for example, modeling results were updated, the

new modeling merely confirmed previous conclusions, and thus did not trigger any obligation to recirculate. (See *San Francisco Baykeeper v. California State Lands Commission* (2015) 242 Cal.App.4th 202, 224-225 [new modeling confirming earlier conclusion about effects of mining on Bay environment did not trigger recirculation]; *Beverly Hills Unified School Dist. v. Los Angeles County Metropolitan Transportation Commission* (2015) 241 Cal.App.4th 627, 660-666 [Final EIR containing substantial amounts of new information, including numerous new seismic studies did not trigger recirculation].)

Consequently, the changes and clarifications presented in Chapter 3 of the Final EIS/EIR were reviewed by the Board to determine whether they constitute "significant new information" requiring recirculation prior to certification of the EIR. This information was found to merely clarify or amplify the information presented in the Draft EIS/EIR. No new feasible alternatives or mitigation measures considerably different from others previously analyzed were identified that would clearly lessen the significant effects of the Recommended Alternative. Further, as discussed in Chapter 3, modifications to mitigation measures (**MM AQ-2, MM AQ-3, MM AQ-5, MM AQ-7, MM BIO-1**, and **MM NOI-2**), would not reduce their effectiveness in reducing significant impacts. Therefore, the Draft and Final EIS/EIR is, and was, found not to require recirculation. Thus, the EIR can be certified without additional public review, consistent with PRC Section 21092.1 and State CEQA Guidelines Section 15088.5.

The Board of Harbor Commissioners finds that all information added to the Final EIS/EIR after public notice of the availability of the Draft EIS/EIR for public review but before certification merely clarifies or makes insignificant modifications to an adequate Draft EIS/EIR that does not require recirculation.

Chapter 7
Findings on Suggested Project Revisions in Comments on the Draft EIS/EIR

Several comment letters were received on the Draft EIS/EIR suggesting project modifications. Where the suggestions (1) requested minor modifications in adequate mitigation measures, (2) requested mitigation for impacts that the Draft EIR determined were less than significant, or (3) requested mitigation for impacts for which the Draft EIR already identified measures that would reduce the impact to less than significant, these requests were declined as unnecessary or not appropriate. Additionally, certain mitigation measures suggested in comments could reduce impacts that would otherwise be significant, but implementation of measures and/or alternatives would be infeasible due to specific economic, environmental, legal, social, technological, policy, or other considerations. LAHD has identified and proposes to incorporate all feasible mitigation measures, including feasible revisions to the existing mitigation measures recommended by commenters. No additional mitigation measures have been determined to be feasible to reduce significant impacts disclosed in the EIS/EIR.

The suggested mitigation measures and the reasons supporting why the recommended measures were rejected are summarized below. Additional detail can be found in the comments and responses to comments chapter of the Final EIS/EIR (Chapter 2). The Board adopts and incorporates by reference the specific reasons for declining such measures contained in the responses to comments in the Final EIR as its grounds for rejecting these measures.

Emission Reductions

Comments were received suggesting that the proposed Project require additional emission reduction strategies, including requiring zero and near-zero emission technologies, requiring stricter engine emission standards for marine and land-based vehicles and equipment, increasing shore power compliance rates, and expanding the Port-wide emission reduction programs. As described in Chapter 3 above and in Chapter 3 of the Final EIS/EIR, several mitigation measures designed to reduce construction (**MM AQ-2**, **MM AQ-3**, and **MM AQ-5**) and operational emissions (**MM AQ-7**) were modified based on public comments for clarification and/or to further reduce emissions. It was determined that other recommended measures would be infeasible due to specific economic, environmental, legal, social, technological, or other considerations. As described in Master Response 2: Zero-Emission Technologies in Chapter 2 of the Final EIS/EIR, LAHD has invested in or secured funding to advance zero- and near-zero technologies in the goods movement industry. The Port believes that zero-emission container movement technologies show great promise for helping to reduce criteria pollutant and GHG emissions in the future. However, longer-term evaluations and real-world testing are required to establish the technical viability, operational reliability, and commercial availability of such technologies. Without the completion of the real-world fleet testing, it is infeasible to require Everport Terminal Services, Inc. (ETS) to use zero-emission

container movement technologies through mitigation. However, in recognition of the potential future promise of such technologies, LAHD has included a lease measure (LM) in the EIS/EIR that requires periodic technology reviews (**LM AQ-1**: Replacement of Equipment and Review of New Technology). This lease measure will ensure that ETS reconsiders the feasibility of emission reduction technologies in the future as the technologies continue to develop. Additionally, as described in Master Response 3: Port-wide Emission Reduction Programs in Chapter 2 of the Final EIS/EIR, LAHD and the Port of Long Beach are committed to updating the San Pedro Bay Ports Clean Air Action Plan (CAAP) this year. The CAAP will continue to push technological improvements for emission reductions at a pace faster than regulations alone. However, the Ports cannot yet rely on any programs in this update to be available and appropriate for claiming additional emission reductions in the EIS/EIR. As technologies become technologically feasible, economically viable, and commercially available in the region, they will become requirements at the Port of Los Angeles as required by lease measure **LM AQ-1** described above.

It should be noted that the Recommended Alternative for approval is Alternative 5, which expands on-dock rail, and was fully analyzed in the EIS/EIR. This would serve to reduce operational air quality and greenhouse gases impacts due to an increase in rail use and a corresponding decrease in truck operations.

Ground Transportation Improvements

Comments were received suggesting that the proposed Project implement ground transportation mitigation measures, including construction of an underground truck tunnel, implementation of a multi-story parking structure, and provision of a dedicated freeway and highway truck lanes. While the proposed Project would make a cumulatively considerable contribution to a significant cumulative impact at study Intersection #14: Ferry Street at SR-47 (Terminal Island Freeway)/Seaside Ave Ramps in 2026 and 2038, the suggested mitigation measures would not address this impact as described in Chapter 2 of the Final EIS/EIR, including Responses to Comments CFSE-8 through 10.

It should be noted that the Recommended Alternative for approval is Alternative 5, which expands on-dock rail, and was fully analyzed in the EIS/EIR. This would serve to increase rail use with a corresponding decrease in truck operations.

Noise Impacts

Comments were received suggesting that additional noise mitigation measures should be considered, including measures to address operational noise and measures contained in the Harbor Community Benefit Foundation four Wilmington Noise Reports. However, as described in Chapter 2 of the Final EIS/EIR Response to Comments CFSE-24 and PH4-1, the construction of the proposed Project would not result in significant noise impacts in Wilmington and would not result in significant noise impacts from operations. As a consequence, operational noise mitigation and construction noise mitigation in Wilmington is not required.

Whale Strikes

A comment (Comment CFSE-26) was received stating that the potential for whale strikes should be mitigated. However, as described in Section 3.3, Biological Resources of the Draft EIS/EIR, beginning on page 3.3-18, this impact is considered less than significant because of the low probability of vessel strikes, including those which may be reasonably foreseeable due

to the project over existing baseline conditions. Even though impacts due to vessel strikes are considered less than significant, with no mitigation required, implementation of mitigation measure **MM AQ-6**, Vessel Speed Reduction Program, would further reduce the potential for vessel collision with marine mammals and sea turtles.

Environmental Justice

Comments were received suggesting the need for additional mitigation measures to address disproportionate effects on minority and/or low-income populations. However, as described in Chapter 2 of the Final EIS/EIR Response to Comment USEPA-5, all feasible project-level mitigation measures have been applied to reduce any high and adverse impact to adjacent communities. Additional mitigation measures would be infeasible due to specific economic, legal, social, technological, or other considerations.

Energy Mitigation

One commenter (Earthjustice) suggested that the EIS/EIR include energy mitigation. However, as described in Master Response 4: Energy Use and Appendix F in Chapter 2 of the Final EIS/EIR, there were no significant energy impacts identified as a result of the project. The project's objective is to improve energy efficiency and the overall efficiency of the facility, which the project would help to do over existing conditions and, therefore, will not result in an inefficient, wasteful or unnecessary consumption of energy. Because energy impacts were found to be less than significant, additional mitigation for energy impacts is not required.

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Chapter 8
Statement of Overriding Considerations

Pursuant to Section 15093 of the State CEQA Guidelines, the Board must balance the benefits of Alternative 5 against unavoidable environmental risks in determining whether to approve the project. As detailed in the Findings, the Recommended Alternative would result in significant unavoidable impacts on air quality, cultural resources, biological resources, and GHG emissions. The Recommended Alternative would also result in a cumulatively considerable contribution to significant cumulative impacts on air quality, biological resources, cultural resources, GHG emissions, ground transportation and noise.

8.1 Project Benefits

The Recommended Alternative offers several benefits that outweigh its unavoidable adverse environmental effects. The Board of Harbor Commissioners adopts the following Statement of Overriding Considerations. The Board recognizes that significant and unavoidable impacts will result from implementation of the Recommended Alternative, as discussed above. Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible any alternatives that would avoid or reduce the significant impacts of the Recommended Alternative, as discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the Recommended Alternative against the Recommended Alternative's significant and unavoidable impacts, the Board hereby finds that the benefits outweigh and override the significant unavoidable impacts for the reasons stated below.

The below stated reasons summarize the benefits, goals, and objectives of Alternative 5and provide the rationale for the benefits of the Recommended Alternative. The Board finds that any one of the environmental, technological, policy, and economic benefits of the Recommended Alternative set forth below is sufficient by itself to warrant approval of the Recommended Alternative. These overriding considerations justify adoption of the Recommended Alternative and certification of the completed Final EIR. This determination is based on the findings herein and the evidence in the record. These benefits include the following:

- **Fulfills Harbor Department's legal mandates and objectives**. The Recommended Alternative would fulfill the Harbor Department's legal mandate under the Port of Los Angeles Tidelands Trust (Los Angeles City Charter, Article VI, Sec. 601; California Tidelands Trust Act of 1911) to promote and develop commerce, navigation and fisheries, and other uses of statewide interest and benefit including industrial and transportation uses and the California Coastal Act (PRC Division 20, Section 30700, et seq.), which identifies the Port and its facilities as a primary economic/coastal resource of the state and an essential element of the national maritime industry and obligates the Harbor Department to modernize and construct

necessary facilities to accommodate deep-draft vessels and to accommodate the demands of foreign and domestic waterborne commerce and other traditional water-dependent and related facilities in order to preclude the necessity for developing new ports elsewhere in the state. Further, the California Coastal Act provides that the Harbor Department should give highest priority to the use of existing land space within harbors for port purposes, including, but not limited to navigational facilities, shipping industries and necessary support and access facilities. The Recommended Alternative would also meet the Harbor Department's strategic green growth objectives by maximizing the efficiency and the capacity of facilities while applying mitigation measures that adhere to and/or exceed the San Pedro Bay Clean Air Action Plan (CAAP) requirements and raise environmental standards.

- **Implements the CAAP.** Project-specific standards and lease measures implemented through CEQA are one of several mechanisms for meeting CAAP requirements.
- **Optimizes land use.** The Recommended Alternative would maximize the utilization of Port lands by increasing the cargo handling efficiency of an existing container terminal to accommodate the demands of foreign and domestic waterborne commerce. The Recommended Alternative would be consistent with LAHD's public trust obligations. The Recommended Alternative would maximize container land use and operations at the Everport Container Terminal consistent with the Port Master Plan.
- **Accommodate projected changes to cargo ship fleet mix.** The Recommended Alternative would upgrade an existing facility to accommodate the servicing of larger container ships which are projected to enter the fleet mix calling at the Port in the future. In particular, the Recommended Alternative provide sufficient depth along Berths 226-229 [-53 MLLW plus two feet of overdepth tolerance for a total depth of -55 feet MLLW] and Berths 230-232 (-47 MLLW plus two feet of overdepth tolerance for a total depth of -49 feet MLLW) to ensure the terminal's ability to accommodate up to 16,000 TEU vessels anticipated to call at the terminal. The Recommended Alternative would improve container terminal backland capacity, and provide new cranes and raise existing cranes to efficiently service the larger container ships anticipated to call at the terminal.
- **Fosters economic growth.** The Recommended Alternative would augment local employment and business opportunities by directly supporting numerous short-term construction and long-term operational jobs and a variety of indirect jobs related to both the construction and operational phases (see Chapter 7, Socioeconomics, of the Draft EIS/EIR). The Recommended Alternative would promote the long-term development and growth of the Port and further the expansion of on-dock rail.

In summary, the Recommended Alternative would allow LAHD to meet its legal mandates to accommodate growing international commerce, while maintaining compliance with important environmental programs and policies. The Board hereby finds that each of the benefits of the Recommended Alternative described above outweighs the significant and unavoidable environmental effects and are therefore considered acceptable.

DRAFT MITIGATION MONITORING AND REPORTING PROGRAM

Document considered draft until Board considers document

Berths 226-236 [Everport] Container Terminal Improvements Project
Environmental Impact Statement/
Environmental Impact Report

September 2017

Prepared by:

Los Angeles Harbor Department
Environmental Management Division
425 S. Palos Verdes Street
San Pedro, CA 90731

With assistance from:

CDM Smith

APP No. 131015-136
SCH No. 2014101050

THE PORT OF LOS ANGELES

US Army Corps of Engineers

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Table 1. Mitigation Monitoring and Reporting Program Summary for the Berths 226-23 [Everport] Container Terminal Improvements Project

Mitigation Measure, Lease Measure or Standard Condition of Approval	Timing and Methods	Responsible Parties
Air Quality and Meteorology		
MM AQ-1. Harbor Craft Used during Construction. Harbor craft used during construction must be equipped with U.S. Environmental Protection Agency (EPA) Tier 3 engine standards or cleaner at all times during construction.	**Timing:** During specified construction phases. **Methods:** LAHD will include MM AQ-1 in the contract specifications for construction. LAHD will monitor implementation of mitigation measures during construction. This measure shall be met unless one the following circumstances exist and the contractor is able to provide proof that such circumstances: ▪ 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.	**Implementation:** LAHD through Construction Contractor **Monitoring and Reporting:** Environmental Management Division, Construction Management Division
MM AQ-2. On-Road Trucks Used during Construction. On-road trucks shall comply with EPA 2010 on-road emission standards or better, unless the contractor provides a written finding consistent with project contract or lease management requirements and obtains written approval from the	**Timing:** During specified construction phases. **Methods:** LAHD will include MM AQ-2 in the contract specifications for construction. LAHD will monitor implementation of mitigation measures during	**Implementation:** LAHD through Construction Contractor **Monitoring and Reporting:**

Mitigation Measure, Lease Measure or Standard Condition of Approval	Timing and Methods	Responsible Parties
Lead Agency that such equipment is unavailable.	construction. A written finding must demonstrate that one the following circumstances exist: ▪ 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.	Environmental Management Division, Construction Management Division
MM AQ-3. Non-Road Construction Equipment (except vessels, harbor craft, on-road trucks, and dredging equipment). All non-road construction equipment greater than 50 hp must meet EPA Tier 4 emission standards, unless the contractor provides a written finding consistent with project contract or lease management requirements and obtains written approval from the Lead Agency that such equipment is unavailable.	**Timing:** During specified construction phases. **Methods:** LAHD will include MM AQ-3 in the contract specifications for construction. LAHD will monitor implementation of mitigation measures during construction. A written finding must demonstrate that one the following circumstances exist: ▪ 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.	**Implementation:** LAHD through Construction Contractor **Monitoring and Reporting:** Environmental Management Division, Construction Management Division

Mitigation Measure, Lease Measure or Standard Condition of Approval	Timing and Methods	Responsible Parties
	▪ 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.	
MM AQ-4. Cargo Ships Used During Construction. All ships and barges used primarily to deliver construction-related materials or cranes shall comply with the expanded Vessel Speed Reduction Program (VSRP) of 12 knots between 40 nautical miles (nm) from Point Fermin and the Precautionary Area.	**Timing:** During specified construction phases. **Methods:** LAHD will include MM AQ-4 in the contract specifications for construction. LAHD will monitor implementation of mitigation measures during construction.	**Implementation:** LAHD through Construction Contractor **Monitoring and Reporting**: Environmental Management Division, Construction Management Division
MM AQ-5. General Construction Mitigation Measure. All dredging equipment must be electric; however, this is subject to availability of the equipment. For MM AQ-1 through MM AQ-4, if a CARB-certified technology becomes available that is as good as or better than the existing measure in terms of emissions performance, the technology could replace the existing technology if approved by LAHD.	**Timing:** During specified construction phases. **Methods:** LAHD will include MM AQ-5 in the contract specifications for construction. LAHD will monitor implementation of mitigation measures during construction.	**Implementation:** LAHD through Construction Contractor **Monitoring and Reporting:** Environmental Management Division, Construction Management Division
MM AQ-6. Vessel Speed Reduction Program (VSRP). Starting January 1, 2019 and thereafter, 95 percent of Evergreen ships calling at the Everport Container Terminal shall be required to comply with the expanded VSRP at 12 knots between 40 nm from Point Fermin and the Precautionary Area. Starting January 1, 2026, 95 percent of all ships calling at the Everport	**Timing:** Throughout operation. **Methods:** LAHD will include MM AQ-6 in the lease agreement with tenant. LAHD will monitor implementation of mitigation measures during	**Implementation:** LAHD and Everport **Monitoring and Reporting:** Environmental Management

Mitigation Measure, Lease Measure or Standard Condition of Approval	Timing and Methods	Responsible Parties
Container Terminal will follow this requirement. Alternative Compliance Plans will be considered where a different speed that would result in fewer emissions compared to the current speed limits. Any alternative compliance plan shall be submitted to LAHD at least 90 days in advance for approval and shall be supported by data that demonstrates the ability of the alternative compliance plan for the specific vessel and type to achieve emissions reductions comparable to or greater than those achievable by compliance with VSRP. The alternative compliance plan shall be implemented once written notice of approval is granted by the LAHD.	operation.	Division
MM AQ-7. Alternative Maritime Power (AMP). By 2020 or upon substantial completion of construction, 90 percent of Evergreen ships calling at the Everport Terminal must use AMP. By 2026, 95 percent of all ship calls at the Everport Container Terminal must use AMP or approved equivalent under the CARB Shore-Power Regulation. The equivalent alternative technology must, at a minimum, meet the emissions reductions that would be achieved from AMP.	**Timing:** Throughout operation. **Methods:** LAHD will include MM AQ-7 in the lease agreement with tenant. LAHD will monitor implementation of mitigation measures during operation.	**Implementation:** LAHD and Everport Monitoring and Reporting: Environmental Management Division
LM AQ-1. Replacement of Equipment and Review of New Technology. When the tenant needs to replace or turnover equipment in its fleet, the tenant shall meet with the LAHD to determine if something is feasible or technologically available that may result in fewer emissions. If any kind of technology becomes available and is shown to be as good as or better than the existing measure in terms of emissions reduction performance, the technology could replace the requirements of other mitigation measures pending approval by LAHD. LAHD shall require the tenant to review any new emissions-reduction technology for feasibility and report back to LAHD every five years beginning five years after lease agreement if no new purchase or equipment turnover occurs sooner as noted in the abovementioned paragraph. If LAHD and tenant determine the technology is feasible in terms of cost and operations, the tenant shall work with LAHD to implement such technology.	**Timing:** Throughout operation. **Methods** LAHD will include LM AQ-1 in the lease agreement with tenant. LAHD will monitor implementation of lease measures during operation.	**Implementation:** LAHD and Everport **Monitoring and Reporting:** Environmental Management Division
LM AQ-2: Priority Access System. A priority access system shall be evaluated to identify one or more ways to provide preferential access to zero- and near-zero-emission trucks. The tenant shall provide a report to LAHD on preferential access system options by January 1, 2020.	**Timing:** Throughout operation. **Methods:** LAHD will include LM AQ-2 in the lease agreement with tenant. LAHD will monitor implementation of lease measures during operation.	**Implementation:** LAHD and Everport **Monitoring and Reporting:** Environmental Management Division

Mitigation Measure, Lease Measure or Standard Condition of Approval	Timing and Methods	Responsible Parties
Biological Resources		
MM BIO-1: Protect Marine Mammals. Although it is expected that marine mammals will voluntarily move away from the area at the commencement of the vibratory or "soft start" of pile driving activities, as a precautionary measure, pile driving activities occurring as part of the sheet pile and king pile installation will include establishment of a safety zone, by a qualified marine mammal professional, and the area surrounding the operations (including the safety zones) will be monitored for marine mammals by a qualified marine mammal observer.[1] The pile driving site will move with each new pile; therefore, the safety zones will move accordingly. [1] Marine mammal professional qualifications shall be identified based on criteria established by LAHD during the construction bid specification process. Upon selection as part of the construction award winning team, the qualified marine mammal professional shall develop site specific pile driving safety zone requirements, which shall follow NOAA Fisheries Technical Guidance Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (NOAA Fisheries 2016) in consultation with the Acoustic Threshold White paper prepared for this purpose by LAHD (LAHD 2017). Final pile driving safety zone requirements developed by the selected marine mammal professional shall be submitted to LAHD Construction and Environmental Management Divisions.	**Timing:** Throughout pile driving operations. **Methods:** LAHD shall include MM BIO-1 in the contract specifications for construction. LAHD shall monitor implementation of mitigation measures during construction.	**Implementation:** LAHD through Construction Contractor **Monitoring and Reporting:** Environmental Management Division, Construction Management Division
Cultural Resources		
MM CR-1: Historic Resource Recordation. Prior to demolition of the former Canner's Steam Company Plant (located within the 22-acre backland area shown in Figure 2-4 of Chapter 2, Project Description, and Figure 3.4-6 of Section 3.4, Cultural Resources of the Draft EIS/EIR), archival documentation of the building will be completed in the form of a Historic American Building Survey (HABS) that shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The documentation shall include large-format photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian and shall be placed in the Port archives.	**Timing:** Prior to the demolition of the former Canner's Steam Company Plant. **Methods:** LAHD shall complete MM CR-1 prior to commencement of demolition activities. LAHD shall retain a qualified archaeologist to evaluate any potential finds prior to demolition.	**Implementation:** LAHD through Construction Contractor **Monitoring and Reporting:** Environmental Management Division, Construction Management Division
MM CR-2: Completion of Phase I Cultural Resource Investigation. A Phase I investigation shall be completed by a qualified archaeologist for all un-surveyed areas of the 22-acre backlands (shown in Figure 2-4 of Chapter 2, Project Description, and Figure 3.4-6 of Section 3.4, Cultural Resources of the Draft EIS/EIR) to rule out the presence of significant resources. Phase II and III investigations shall be completed if significant	**Timing:** Prior to construction within the 22-acre backlands expansion area. **Methods:** LAHD shall complete MM CR-2 prior to commencement of construction activities of the 22-acre backlands. LAHD shall retain a qualified archaeologist	**Implementation:** LAHD through Construction Contractor **Monitoring and Reporting:** Environmental Management Division, Construction

Mitigation Measure, Lease Measure or Standard Condition of Approval	Timing and Methods	Responsible Parties
archaeological resources are not ruled out. Furthermore pre-construction worker training shall be completed if significant resources are not ruled out. Furthermore, pre-construction worker training shall be completed as described in MM CR-3.	to evaluate any potential finds prior to construction.	Management Division
MM CR-3: Pre-construction Worker Training. Prior to the commencement of landside construction activities, qualified archaeologist and paleontologist retained by the LAHD or their designee shall provide training to construction personnel to provide information on regulatory requirements for the protection of cultural resources. This training may take the form of examples of cultural resources to look for and protocols to follow if discoveries are made. The archaeologist/paleontologist shall develop the training and any supplemental materials necessary to execute said training.	**Timing:** Prior to construction activities. **Methods:** LAHD shall include MM CR-3 in the contract specifications so that a qualified archaeologist shall perform the training to all construction personnel related to the protection of cultural resources.	**Implementation:** LAHD through Construction Contractor **Monitoring and Reporting:** Environmental Management Division, Construction Management Division
SC CR-1: Stop Work in the Area if Prehistoric and/or Archaeological Resources are Encountered. In the unlikely event that any prehistoric artifact is encountered during construction, work shall be immediately stopped and the area secured until the materials found can be assessed by a qualified archaeologist.	**Timing:** Throughout construction. **Methods:** LAHD shall include SC CR-1 in the contract specifications for construction. LAHD shall monitor implementation of standard conditions of approval during construction.	**Implementation:** LAHD through Construction Contractor **Monitoring and Reporting:** Environmental Management Division, Construction Management Division
SC CR-2: Unanticipated Discovery of Paleontological Resources. In the event that a paleontological resource is encountered during construction, the contractor shall stop construction and a qualified paleontologist shall evaluate the significance of the resource. Additional monitoring recommendations may be made at that time. If the resource is found to be significant, the paleontologist shall systematically remove and stabilize the specimen(s) in anticipation of preservation. Curation of the specimen shall be in a qualified research facility, such as the Los Angeles County Natural History Museum.	**Timing:** Throughout construction. **Methods:** LAHD shall include SC CR-2 in the contract specifications for construction. LAHD shall monitor implementation of standard conditions of approval during construction.	**Implementation:** LAHD through Construction Contractor **Monitoring and Reporting:** Environmental Management Division, Construction Management Division
Greenhouse Gas Emissions		
MM GHG-1 – LED Lighting. All fixtures on the high mast poles at the Everport Container Terminal shall be replaced with LED fixtures or a technology with similar energy-saving capabilities.	**Timing:** Tenant must complete replacement of lighting by December 31, 2020. **Methods:** Tenant shall include MM GHG-1 in the construction specifications.	**Implementation:** Tenant through its own construction contractor in conjunction with LAHD **Monitoring and Reporting:** Environmental Management

Mitigation Measure, Lease Measure or Standard Condition of Approval	Timing and Methods	Responsible Parties
		Division, Construction Management Division
MM GHG-2 – Solar Electricity. Photovoltaic panels shall be installed over the employee parking lot as part of the development of the 22 acres, pending a feasibility study.	**Timing:** Feasibility study must be conducted prior to design and construction of the 22-acre backlands. **Methods:** Tenant shall include MM GHG-2 and its feasibility potential into construction specifications	**Implementation:** Tenant through its own construction contractor in conjunction with LAHD **Monitoring and Reporting:** Environmental Management Division, Construction Management Division
LM GHG-1: GHG Credit Fund. Proposed Project GHG emissions are 99,856 metric tons of CO_2e above the CEQA Baseline in the peak year of operations in 2038. They exceed the 10,000 metric ton CO_2e significance threshold by 99,856 metric tons. Because operational GHG emissions exceed the significance threshold with the incorporation of all feasible mitigation measures, LAHD shall establish a carbon offset fund, which may be accomplished through a Memorandum of Understanding with the California Air Resources Board or another appropriate entity, to mitigate project GHG impacts to the maximum extent feasible. The fund shall be used for GHG-reducing projects and programs on Port of Los Angeles property. It shall be the responsibility of the Tenant to contribute to the fund. Fund contribution shall be the equivalent of 1 percent of the minimum annual guarantee (MAG) at the time that project construction will commence. This amount will be approximately $300,000, payable upon substantial completion of Project construction. This amount is appropriate because it takes into account the tenant's actual container throughput and assesses a fee in correlation with the facility's GHG contribution level. If LAHD is unable to establish the fund within a reasonable period of time, the Tenant shall instead purchase credits from an approved GHG offset registry in the amount of approximately $300,000.	**Timing:** Payable upon substantial completion of Project construction. **Methods:** LAHD shall include LM GHG-1 in the lease agreement with tenant. LAHD shall monitor implementation of mitigation measures during operation.	**Implementation:** LAHD and Everport **Monitoring and Reporting:** Environmental Management Division
Noise		
MM NOI-1: Noise Reduction during Pile Driving. The contractor shall be required to use a pile driving system which is capable of limiting maximum noise levels at 50 feet from the pile driver to 104 dBA, or less, for wharf construction.	**Timing:** Throughout pile driving operations. **Methods:** LAHD shall include MM NOI-1 in the contract specifications for construction. LAHD shall monitor implementation of mitigation measures during construction.	**Implementation:** LAHD through Construction Contractor **Monitoring and Reporting:** Environmental Management

Mitigation Measure, Lease Measure or Standard Condition of Approval	Timing and Methods	Responsible Parties
		Division, Construction Management Division
MM NOI-2: Utilize Temporary Noise Attenuation Curtain Adjacent to Pile Driving Equipment. If under MM NOI-1 the reduced pile driving noise exceeds 103 dBA at 50 feet from the pile driver, utilize temporary noise attenuation curtain suitable for pile driving equipment as needed. This noise attenuation device should be installed directly between the equipment and the nearest noise sensitive receptor to the construction site.	**Timing:** Throughout pile driving operations. **Methods:** LAHD shall include MM NOI-2 in the contract specifications for construction. LAHD shall monitor implementation of mitigation measures during construction.	**Implementation:** LAHD through Construction Contractor **Monitoring and Reporting:** Environmental Management Division, Construction Management Division