



# South Coast Air Quality Management District

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Ms. Josephine Axt, Ph.D.  
Chief, Planning Division  
U.S. Army Corps of Engineers  
ATTN: Mr. Larry Smith, CESPL-PD-RQ  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Dear Dr. Axt:

**Draft Supplemental Environmental Assessment  
for the Port of Long Beach Turning Basin Deepening Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The lead agency concluded that air quality impacts are not significant without quantifying emissions from the proposed project. Without the quantification of air pollutant emissions and comparing them to SCAQMD air quality significance thresholds or federal and state ambient air quality standards, the lead agency has not demonstrated that air quality impacts from the proposed project are not significant.

The attached comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Assessment (EA). Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EA. SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact me at (909) 396-3054 or James Koizumi at (909) 396-3234 if you have any questions regarding these comments.

Sincerely

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

Attachment

SS:JK

LAC070817-03  
Control Number

**Attachment A**  
**Draft Supplemental Environmental Assessment**  
**for the Port of Long Beach Turning Basin Deepening Project**

1. The Draft Supplemental EA lists only the federal ambient air quality standards (AAQS) as criteria for air quality impacts. Since the project is within SCAQMD jurisdiction, the significance criteria should be expanded to include the state AAQSs and SCAQMD recommended CEQA significance thresholds (<http://www.aqmd.gov/ceqa/handbook/signthres.pdf>).
2. It is unclear how the lead agency can conclude that air quality impacts are not significant without quantifying emissions from the proposed project. For example, the Draft Supplemental EA states that criteria pollutant emissions are generated by dredge support vessels and tugs at the disposal site used to position the barge. The Draft Supplemental EA states that criteria emissions come from dredge support vessels and tugs at the disposal site used to position the barge. The lead agency concludes that adverse air quality impacts are determined to be less than significant because the operations are temporary and intermittent.

While construction is expected to last only a year, air quality impacts are typically compared to criteria pollutant significant thresholds based on shorter averaging times (1-hour, 8-hour, 24-hour as well as annual). Since criteria pollutant emissions were not quantified, the lead agency has not demonstrated that the emissions are below the significance criteria. In addition, since the federal AAQSs are used by the lead agency as significance thresholds, the project criteria pollutant emissions would need to be converted to concentrations at specific sensitive, residential and worker receptors using an air dispersion model to determine whether AAQSs are exceeded, because the AAQSs are presented as concentrations with specific averaging times (1-hour, 8-hour, 24-hour and annual). Methodology for this analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

Without quantifying criteria pollutant emissions/concentrations and comparing them to SCAQMD air quality significance thresholds or federal and state ambient air quality standards to determine if the project will cause or contribute to an exceedance, the lead agency has not demonstrated that air quality impacts are not significant. The Final Supplemental EA should quantify criteria pollutants and compare them to federal, state and local significance thresholds.

3. Only a discussion of criteria pollutant emissions from construction activities is presented in the Draft Supplemental EA. Since information from the original EA was not included in the materials provided to the SCAQMD, it is unclear if criteria pollutant emissions from ships in the turning basin and Berth T-121 were evaluated in it. If criteria pollutant emissions from ships in the turning basin and Berth T-121 were not evaluated in the original EA, or the analysis has changed substantially, operational criteria pollutant emissions should be quantified and analyzed in the Final Supplemental EA.
4. No discussion or analysis of greenhouse gases is included in the Draft Supplemental EA. SCAQMD staff recommends that the lead agencies quantify greenhouse gas emissions. In a

number of comment letters on CEQA documents prepared by the California Attorney Generals Office, the Attorney General has unequivocally stated that GHG emission and global climate change are impacts that must be analyzed in CEQA documents. Further, a determination of significance must be made, even in the absence of established GHG significance thresholds. Finally, if GHG emissions are concluded to be significant, mitigation measures must be identified.

5. Since the original EA was completed in 1995 with a Supplemental EA in 1998 but no information or data from that document were provided in the current EA sent to SCAQMD staff, it is not clear if air toxics and PM2.5 adverse emission impacts from the ships were included in the original EA or if the emissions have changed substantially. If air toxics and PM2.5 emissions from the ships were not included in the original EA, then they should be quantified in the Final Supplemental EA. An HRA should be prepared that presents the incremental increase of adverse health risk to sensitive, residential and worker receptors near the turning area and the berth that would be made accessible by the turning area. Therefore, the discussion in the Final Supplemental EA should include a qualitative analysis of toxic and PM2.5 adverse emission impacts from the proposed project.