



South Coast
Air Quality Management District

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E-mailed: July 23, 2010
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July 23, 2010

Mr. Larry Smith, CESPL-PD-RQ
Department of the Army
Los Angeles District Corps of Engineers
Los Angeles, CA 90053-2325

**Review of the Draft Environmental Assessment (EA) for the
Entrance Channel Maintenance Dredging at Marina Del Rey Harbor Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the final Environmental Assessment (EA) as appropriate.

Based on a review of the draft EA the AQMD staff is concerned that the lead agency relies on data and information from the Mission Bay Dredging Project to estimate the proposed project's air quality impacts. Specifically, AQMD staff is concerned that the lead agency fails to use project specific information to estimate the project's criteria pollutant emissions that could result in an underestimate of air quality impacts from the proposed project. Also, AQMD staff is concerned that the proposed project does not use an appropriate methodology to make a conformity determination required by Section 176 of the Clean Air Act (CAA). Further, based on Figure 2 (Marina Del Ray Harbor Composite Areas) in the draft EA the AQMD staff is concerned about potential localized air quality impacts to sensitive receptors adjacent to the project site. As a result, the AQMD staff recommends that the lead agency revise the draft EA to include a project specific analysis that identifies all potential regional and localized air quality impacts from the proposed project.

AQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

[IM:DG](#)

LAC100629-05
Control Number

Project Specific Analysis

1. In Section 4.4 (Air Quality) of the draft EA the lead agency states that the proposed project is similar in scope to the Mission Bay Dredging Project. Also, the lead agency states that the emissions from the proposed project are approximately equivalent to the Mission Bay Dredging Project; however, the lead agency does not provide any specific emissions data for this project. For example, the lead agency does not provide a list of equipment pieces, applicable emission factors and construction schedule used to determine the project's estimated daily emissions. Further, the lead agency does not demonstrate the methodology used to calculate the project's daily emission values.

AQMD staff is concerned that the Mission Bay Dredging Project emission values may not be comparable or applicable to the proposed project. Specifically, AQMD staff is concerned that the project's estimated daily emissions may potentially be inaccurate and/or underestimated. Therefore, AQMD staff requests that the lead agency revise the draft EA to include the detailed emissions data from the Mission Bay Dredging Project including; but not limited to: an equipment list, emissions factors, hours of operation, project duration and emissions calculation methodology. If the lead agency finds a discrepancy between the proposed project and the Mission Bay Dredging Project the AQMD staff recommends that the lead agency revise the Draft EA using project specific information to estimate the project's emissions and determine if the project will have any potentially significant air quality impacts. In the event that the lead agency finds any significant air quality impacts from the proposed project the AQMD staff recommends that the lead agency consider all feasible mitigation measures to reduce construction air quality impacts.

Conformity

2. On page 30 of the draft EA the lead agency states that project emissions are not expected to exceed "de minimis" levels, therefore, the project is consistent with the SIP and meets the conformity requirements set forth in Section 176 of the CAA. However, the lead agency fails to demonstrate that the project's emissions do not exceed "de minimis" levels in the draft EA.

The South Coast Air Basin is considered an extreme non-attainment area for ozone; as a result, the NOx emissions significance threshold for conformity is ten (10) tons per year. On page 19 of the draft EA the lead agency concludes that the proposed project will emit 91.3 pounds per day of NOx, however, the lead agency does not convert this value to an annual emissions value. Therefore, AQMD staff requests that the lead agency specify the number of days for project construction and provide the project's annual emissions values for criteria pollutants. Once the lead agency has determined these emissions values AQMD staff recommends that the lead agency compare the values to the conformity thresholds of significance and make a significance determination.

Localized Air Quality Analysis

3. Given that the proposed project includes dredging activity in close proximity to sensitive receptors (i.e., residences) the AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). Specifically, AQMD staff is concerned about the residences to the north and south of Area 9 identified on Figure 2 (Marina Del Rey Harbor Composite Area) in the draft EA. LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts. Therefore, when revising the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>. In the event that the lead agency finds any significant localized air quality impacts from the proposed project the AQMD staff recommends that the lead agency consider all feasible mitigation measures to reduce construction air quality impacts.