



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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Hayley.J.Lovan@usace.army.mil

Ms. Hayley Lovan (CESPL-PD-RN)
Project Environmental Coordinator
U.S. Army Corps of Engineers
Los Angeles District
P.O. Box 532711
Los Angeles, CA 90053-2325

**Review of the Draft Supplemental Environmental Assessments for the
California Institute for Women Dike Project,
the Santa Ana River Flood Control Project Reach 9, Phase 2A,
and the Yorba Slaughter Adobe Dike Project**

South Coast Air Quality Management District staff has reviewed the general conformity portion of the Draft Supplemental Environmental Assessment and Addendum to Environmental Impact Report 583 for the California Institute for Women Dike Project, the Yorba Slaughter Adobe Dike Project and the Santa Ana River Flood Control Project - Reach 9, Phase 2A Embankment (Reach 9) dated August, 2010. Based on the data provided, we have the following comments.

All three projects compared the estimated construction emissions to the general conformity ozone "severe" nonattainment area's de minimis thresholds to determine the projects' conformance to federal conformity requirements. However, South Coast Air Basin 8-hour ozone nonattainment status was bumped up from "severe-17" nonattainment to "extreme" nonattainment last May. (See 75 FR 24409, May 5, 2010) Consequently, both VOC and NOx de minimis thresholds were changed from 25 tons per year to 10 tons per year according to the federal conformity regulations (40 CFR 93.153(b)(1)). The three documents should each be revised to reflect this change.

In addition, the Reach 9 project does not comply with general conformity because this project's estimated 2011 construction NOx emissions were 15.67 tons per year. To meet the conformity determination requirements, a general conformity applicability analysis and determination and further strategies and/or steps to reduce the emissions are expected for the Reach 9 project.

Ms. Hayley Lovan
Project Environmental Coordinator

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If you have any questions, please contact Ms. Kathy Hsiao at (909) 396-3056 or
khsiao1@aqmd.gov.

Sincerely,



Ian MacMillan

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

IM:KH

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