



South Coast  
Air Quality Management District

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E-mailed: July 8, 2011  
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July 8, 2011

Ms. Josephine R. Axt  
Chief, Planning Division  
U.S. Army Corps of Engineers  
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**Review of the Draft Environmental Assessment (draft EA) for the  
Lower Newport Bay Maintenance Dredging 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 as appropriate.

AQMD staff is concerned that the air quality analysis in the draft EA does not provide sufficient information to demonstrate the lead agency's determination that the project will result in insignificant air quality impacts and federal conformity. Given the limited scope of technical information (i.e., emissions calculations, emissions factors, assumed equipment pieces, etc) in Appendix D of the draft EA the AQMD staff was unable to reconcile the emissions data provided to confirm the lead agency's air quality determination. As a result, the AQMD staff is concerned that the air quality impacts may be understated in the draft EA and potentially significant impacts may not have been disclosed to the public or sufficiently mitigated

AQMD staff recommends that the lead agency revise the air quality analysis and include the project's potential localized and cumulative air quality impacts. The revised air quality analysis should clearly demonstrate (with sufficient technical data, emissions calculations and emissions methodology) that the project renders insignificant air quality impacts. In the event that the lead agency determines that the project will have significant air quality impacts the lead agency should provide feasible mitigation measures to reduce these impacts to a less than significant level. Details regarding these comments are enclosed.

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 these comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan

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

IM:DG

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Control Number

### Regional Air Quality Analysis

1. As stated in the draft EA the details to the estimated maximum daily emissions values provided on page 17 and 18 are provided in Appendix D. However, Appendix D does not provide the explicit methodology that was used to calculate the project's air quality impacts; therefore, AQMD staff does not have the ability to determine the technical adequacy of the information contained in the draft EA. Therefore, we recommend that the lead agency review and make this information available in the final EA. If upon review of the methodology the lead agency determines that the proposed project will yield significant air quality impacts the AQMD staff recommends mitigation measures are included in the final EA to minimize the projects air quality impacts.<sup>1</sup> Specific additional information that should be included in the final EA includes:
  - More detailed information on the dredging vessel. The project description includes mechanical dredging, however, the HR Morris cited in Appendix D is a pipeline dredging vessel. Backup documentation should also be provided on vessel emissions.
  - Details regarding how engines from the "Emissions Factors for Dredges" table in Appendix D correspond with various dredging activities.
  - Specific derivation of the clamshell/excavator emissions factors. For example, the 1.1 pounds per hour (lb/hr) NOx emissions rate for the 1,890 horsepower (hp) engine is substantially lower than the 3.02 lb/hr rate from the OFFROAD2007 emissions factors for a much smaller 750 hp excavator.<sup>2</sup>
  - Specific derivation of the 36.9 pounds per day of NOx for tugboats should be disclosed. This value appears to be substantially underestimated, especially for daily round trips from Newport Harbor to the Port of Long Beach.

### Localized Air Quality Impacts

2. Based on a review of the draft EA the AQMD staff is concerned about potential localized air quality impacts to the sensitive receptors (i.e., residences) that surround the project site. Specifically, Appendix E of the draft EA indicates that single family residences are located adjacent to the project site. Pursuant to 40 CFR Section 1508.27 of the Council of Environmental Quality's regulations the lead agency should calculate the potential localized air quality impacts from the proposed project and compare the results to localized significance thresholds (LSTs) in the final EA.

The LSTs should be used in addition to the recommended regional significance thresholds to determine air quality impacts in the immediate vicinity. Therefore, 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

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<sup>1</sup> A list of construction related mitigation measures are available at the following address:

[http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

<sup>2</sup> Off-road emissions factors available at: <http://www.aqmd.gov/ceqa/handbook/offroad/offroad.html>

necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>.

#### Cumulative Air Quality Impacts

3. Pursuant to 40 CFR Section 1508.7 of the Council of Environmental Quality's regulations the AQMD staff recommends that the lead agency include quantification of the potential local and regional cumulative air quality impacts from the proposed project and other nearby simultaneous projects and make a significance determination in the final EA.

#### Air Quality Mitigation Measures

4. In the event that the lead agency finds any significant regional, localized and/or cumulative air quality impacts from the proposed project the lead agency should consider all feasible mitigation measures to reduce the project's construction-related air quality impacts including the use of cleaner burning construction equipment.<sup>3</sup>

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<sup>3</sup> A list of construction related mitigation measures are available at the following address: [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)