



South Coast
Air Quality Management District

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**Draft Supplemental Environmental Assessment (Draft SEA) for the Santa Ana River:
Reach 9 Phase II Green River Mobile Home Park Embankment**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to review the Draft SEA. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final SEA

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final SEA. The SCAQMD staff would be happy 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,

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

Attachment

SS:DG

RVC080806-01

Control Number

Air Quality Analysis-General

The proposed project that the Draft SEA analyzes includes a 3.93-acre embankment, a 4.3-acre staging area and a 9.07-acre construction easement; however, the lead agency does not quantify the project's air quality impacts. The Draft SEA should contain sufficient technical data to permit a full assessment of all potentially significant environmental impacts by responsible agencies, commenting agencies and members of the public.

To quantify potentially significant air quality impacts, construction impacts, in particular, the Final SEA should include the emission factors and methodologies that are used to establish peak daily air quality impacts from the proposed project. The evaluation of potential air quality impacts from the proposed project should at a minimum include construction emissions from cut-and-fill operations, grading activities, and on-road mobile sources and off-road mobile sources for both construction and transportation equipment.

The SCAQMD staff recommends that the peak daily air quality impacts from the proposed project be quantified and compared to the SCAQMD significance thresholds. Although the Environmental Impact Report 583 may evaluate some of the aforementioned air quality impacts the Lead Agency should quantify the potential for additional regional and localized air quality impacts due to the re-location of the proposed project. Air quality analysis methodologies to quantify air quality impacts include: methodologies in the SCAQMD's CEQA Air Quality Handbook; the URBEMIS 2007 land use model (www.urbemis.com), or other publicly available and documented methodologies. The Lead Agency can determine the extent of air quality impacts by using the SCAQMD adopted significance thresholds as a guide to determine the projects level of significance. The SCAQMD's adopted significance thresholds are available at: <http://www.aqmd.gov/ceqa/hdbk.html>.

In the event that the quantified air quality impacts from the proposed project exceed the SCAQMD's established significance thresholds, mitigation measures may be necessary to reduce potential air quality impacts. The control efficiency for each feasible mitigation measures should be specified and applied to the total emissions estimated for the project resulting in its overall air quality impacts. For lists of the potential feasible mitigation measures, please refer to the following URL: www.aqmd.gov/ceqa/handbook/mitigation.MM_intro.html

The conclusion (Chapter 11) in the Draft SEA that states "the embankment would not have a significant impact on the environmental quality of the area," may be premature given that the Lead Agency has failed to demonstrate that the proposed project will not generate significant adverse air quality impacts pursuant to the California Environmental Quality Act. The SCAQMD staff requests that the Lead Agency fully evaluates and discloses the potential air quality impacts from the proposed project for further review and analysis.