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Draft Program Environmental Impact Report (Draft PEIR) for the Proposed City of Los Angeles Solid Waste Integrated Resources Plan (SWIRP) SCH #2010081061)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

The lead agency proposes goals meant to maximize waste prevention, recycling, resource recovery, and to reduce urban land filling under the lead agency's long-range Solid Waste Integrated Resources Plan (SWIRP) in order to achieve its goal of 75 percent diversion of solid waste generated within its boundaries by 2013 and 90 percent diversion by 2025. The proposed project would include construction of facilities at locations that are not yet identified that will meet the City of Los Angeles's recycling and solid waste infrastructure needs through 2030. With full implementation, post-processed project residual waste is estimated to be approximately 1.5 million tons of materials annually. The residual waste would then be transported directly to a landfill by refuse collection trucks, loaded to transfer trucks at local transfer stations for movement to a landfill or hauled by rail to landfills outside of the local region. Infrastructure would also include construction of rail transfer stations, intermodal facilities, rail tracks and spurs, and other related infrastructure.

Operational Thresholds of Significance and Operational Emission Estimates

Although the Draft PEIR shows the SCAQMD Air Quality Significance Thresholds in Table 4.3-11, the SCAQMD recommended daily significance operational thresholds are incorrectly stated in Table 4.3-21(Olinda Alpha Landfill Operation Emissions for NOx, ROC, PM10 and CO). Although corrections to the SCAQMD threshold portion of Table 4.3-21 may not change the lead agency's determination of significance, the SCAQMD thresholds listed under NOx, ROC, PM10 and CO should be revised in the Final PEIR. Corrections to the SCAQMD thresholds of significance in Table 4.3-22 (Anticipated Vehicular Emissions for Each Facility), however, show that operational impacts for the

Composting and Resource Recovery facility types will exceed the SCAQMD recommended daily significance threshold for NOx. Further, the cumulative impacts of all the facilities operating together should be presented and compared against the SCAQMD thresholds of significance.

In addition, emission estimates for PM2.5 were not included in the operational estimates in Table 4.3-21. In order to demonstrate that PM2.5 emissions are less than significant, PM2.5 impacts should be estimated, compared with the applicable threshold, and included in the Final CEQA document.

Localized Significance Threshold Analyses

In the project description on page 2-1, the lead agency identifies the number and types of SWIRP facilities but did not identify specific site locations at this point in the planning process. In addition to the future environmental review including health risk effects mentioned on page 4.3-46, the SCAQMD staff also recommends that localized air quality impacts be estimated when future facilities are proposed to ensure that any nearby sensitive receptors are not adversely affected by the proposed construction or operational activities occurring in close proximity, within one-quarter mile of sensitive receptors.

SCAQMD guidance for performing a localized air quality analysis can be found on the SCAQMD web page.[1] Should the lead agency conclude after its analyses that construction or operational localized air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures in addition to those measures listed starting on page 4.3-51 of the Draft PEIR that can be implemented if the air quality impacts are determined to be significant. [2]

Use of CalEEMod Land Use Model to Estimate Baseline and Project Emissions

In its air quality analysis, the lead agency estimated project emission impacts using the URBEMIS2007 land use computer model. The SCAQMD staff no longer recommends using URBEMIS2007 to estimate project impacts. Instead, a more comprehensive land use model with updated mobile source emission rates is available, the California Emissions Estimator model (CalEEMod)[3]. The current version of CalEEMod (Version 2013.2.2) uses the new EMFAC2011 and OFFROAD2011 emission factors rather than the outdated EMFAC2007 and OFFROAD2007 emission rates used in URBEMIS2007 and earlier versions of CalEEMod. In addition, CalEEMod provides updated methods and emission factors for non-vehicular sources. For a more current estimate, the SCAQMD staff therefore recommends revising the air quality analysis in the Final Draft PEIR using the CalEEMod land use model.

[1] http://www.aqmd.gov/ceqa/handbook/LST/LST.html
[2] http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html
[3] The current California Emission Estimator Model (CalEEMod) accessible at www.caleemod.com

On-Site Emissions

Finally, based on review of Section 4.3 Air Quality and the URBEMIS2007 modeling output sheets in Appendix C, the regional air quality analysis does not include on-site emission estimates in the Draft PEIR. Although Table 4.3-22 shows regional estimates from transfer trucks and employee trips for each facility type, on-site emission estimates for trucks and off-road equipment operating at the facilities as well as fugitive emissions from waste are not included in the regional analysis. These emissions should be included in the Final PEIR and compared with applicable significance thresholds to account for all project emissions.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

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