



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL:

September 05, 2024

[NoCoSolidWasteEIR@pw.lacounty.gov](mailto:NoCoSolidWasteEIR@pw.lacounty.gov)

Krystle K. Jafari, Associate Civil Engineer

County of Los Angeles

Department of Public Works

P.O. Box 1460

Alhambra, CA 91802-1460

**Notice of Availability of a Draft Environmental Impact Report for the  
North County Solid Waste Collection Services Project  
(SCH No. 2022020271)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The County of Los Angeles Department of Public Works is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project would implement organic waste collection and diversion services and expand recycling services in the project area. If the project is approved, Public Works will issue a revised solicitation for waste haulers to provide services to the four proposed solid waste collection service areas. Under the proposed franchise contracts, selected solid waste haulers would provide a source-separated collection of three waste streams (refuse, recyclables, and organic waste, including manure) for all residential and commercial customers. The selected waste haulers would also provide illegal dumping pickup services within the public right-of-way and bulky item pickup upon request. The project encompasses approximately 1,419 square miles and comprises unincorporated areas in northern Los Angeles County, located north of the Angeles National Forest. Kern County bounds the project to the north, San Bernardino County to the east, Angeles National Forest to the south, and Ventura County to the west.

South Coast AQMD Staff's Comments

*Use of South Coast AQMD's Localized Significance Threshold (LST) Methodology for Air Quality Impact Analysis*

Based on the Draft EIR, the lead agency has not provided any analysis of localized significance thresholds (LSTs) for operational emissions. Pursuant to CEQA Guidelines Section 15064 – Determining the Significance of the Environmental Effects Caused by a Project – the lead agency is responsible for conducting a detailed analysis to estimate potential localized and

regional air quality impacts. Therefore, it is recommended to include a table in the air quality impact section to evaluate the maximum daily on-site operational emissions and compare the on-site emissions against South Coast AQMD's LSTs. These emissions can be evaluated using a spreadsheet or California Emissions Estimator Model (CalEEMod), a land use emissions estimation software. Additionally, based on the extend of the Proposed Project South Coast AQMD recommends lead agencies perform project-specific dispersion modeling to determine operational localized air quality impacts and include the results in the Final EIR.

#### *Health Risk Assessment (HRA) during Project Operation*

CEQA Guidelines Sections 15126.2 and 15126.4 require a Draft EIR to include a description of the significant environmental effects of a Proposed Project, significant environmental effects that cannot be avoided, significant irreversible environmental changes, growth-inducing impacts, and mitigation measures proposed to minimize the significant adverse impacts. An impact is considered significant under CEQA if it leads to a "substantial, or potentially substantial, adverse change in the environment." In addition to the air quality impacts from criteria air pollutants and greenhouse gases, the adverse air quality health risk impacts associated with increased emissions of toxic air contaminants (TACs) from all sources (including but not limited to expected future additional mobile sources, increased use of permitted stationary and portable sources, and other emission sources) during the operation phases must be appropriately evaluated using qualitative and/or quantitative approaches to determine whether there will be potentially substantial adverse impacts. Based on the Draft EIR, treating 6% of unpaved roads in the Project area (even with a more effective dust suppression frequency) would not sufficiently avoid or substantially reduce the Project's Particulate Matter (PM) emissions from fugitive dust. Currently, the potential cancer risk linked to the Proposed Project is both unknown and undisclosed in the DEIR. Consequently, the surrounding community remains exposed to significant PM and TAC emissions. It is recommended that the Lead Agency conduct a comprehensive Health Risk Assessment (HRA) for mobile, stationary, and portable sources during the operation phase. Please refer to the South Coast AQMD's guidance for performing a mobile source HRA.<sup>1</sup>

#### *Additional Recommended Air Quality and Greenhouse Gases Mitigation Measures and Project Design Considerations*

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

#### ***Mitigation Measures for Operational Air Quality Impacts***

##### Mobile Sources

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx

---

<sup>1</sup> South Coast AQMD's guidance for performing a mobile source health risk assessment is available at: <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

Note: Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

#### Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

#### Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporating additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act<sup>2</sup>
2. South Coast AQMD 2022 Air Quality Management Plan,<sup>3</sup> specifically:
  - a) Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
  - b) Appendix IV-B – CARB’s Strategy for South Coast
  - c) Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.<sup>4</sup>

#### *South Coast AQMD Air Permits and Role as a Responsible Agency*

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The final CEQA document, whether a MND or EIR, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201– Permit to Construct, Rule 203 – Permit to Operate,<sup>5</sup> Rule 401 – Visible Emissions,<sup>6</sup> Rule 402 – Nuisance,<sup>7</sup> Rule 403 – Fugitive Dust,<sup>8</sup> Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,<sup>9</sup> Rule 1113 – Architectural Coating,<sup>10</sup> Rule 1166 – VOC Contaminated Soil Excavation,<sup>11</sup> Rule

---

<sup>2</sup> State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>

<sup>3</sup> South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

<sup>4</sup> United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

<sup>5</sup> South Coast AQMD. Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

<sup>6</sup> South Coast AQMD. Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

<sup>7</sup> South Coast AQMD. Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

<sup>8</sup> South Coast AQMD. Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

<sup>9</sup> South Coast AQMD. Rule 1110.2 available at [https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110\\_2.pdf](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf)

<sup>10</sup>South Coast AQMD. Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

1179 – Publicly Owned Treatment Works Operation,<sup>12</sup> Regulation XIII – New Source Review,<sup>13</sup> Rule 1401 – Air Toxics,<sup>14</sup> Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,<sup>15</sup> Rule 1470 – Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines,<sup>16</sup> etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the MND is inadequate to be relied upon for this purpose.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

## Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final

---

<sup>11</sup> South Coast AQMD. Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

<sup>12</sup> South Coast AQMD. Rule 1179 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

<sup>13</sup> South Coast AQMD. Regulation XIII available at <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

<sup>14</sup> South Coast AQMD. Rule 1401 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

<sup>15</sup> South Coast AQMD. Rule 1466 available <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

<sup>16</sup> South Coast AQMD. Rule 1470 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SG:SW

LAC240724-11

Control Number