

FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

DIRECT DISPOSAL LARGE VOLUME SOLID WASTE TRANSFER/PROCESSING FACILITY

SCH No. 2019079096

Lead Agency:

City of Los Angeles Local Enforcement Agency
221 N. Figueroa Street, Rm. 1250
Los Angeles, CA 90012
(213) 252-3348

August 2020

FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Pursuant to the California Environmental Quality Act (Division 13, Public Resources Code)

Proposed Project

The proposed project entails an application for a Large Volume Solid Waste Facility Permit (SWFP) to allow expansion of the existing 175 ton per day (TPD) Direct Disposal Medium Volume Construction, Demolition and Inert (CDI) Material Recovery Facility (MRF) (reference CalRecycle SWFP no. 19-AR-1228), located at 3720 Noakes Street in the City of Los Angeles. The proposed Large Volume SWFP will allow up to 500 TPD of CDI and solid waste to be processed and transferred at the Direct Disposal facility. Of the 500 TPD permitted capacity, up to 100 TPD may be Municipal Solid Waste (MSW).

Determination

Based on the analysis provided in this Initial Study/Mitigated Negative Declaration (IS/MND), the Local Enforcement Agency (LEA) finds that, with incorporation of described revisions to the Project and mitigation measures, the proposed Project would not have a significant effect on the environment.

ORGANIZATION OF THE FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

This Final IS/MND has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] 21000 et. seq.) and the CEQA Guidelines (California Code of Regulations [CCR] 15000 et. seq.).

This Final IS/MND is organized into the following sections:

- **Section 1 - Clarifications and Modifications** - provides a detailed description of all clarifications and modifications to the text or graphics of the Draft Initial Study/Mitigated Negative Declaration (IS/MND). Clarifications and modifications reflect changes made to the proposed Project, analysis, or mitigation measures due to editorial changes or because of a comment made by an agency or individual during the public review period. These clarifications and modifications do not constitute significant new information and do not change any of the conclusions of the document.
- **Section 2 - Response to Comments on the Draft IS/MND** - provides a list of agencies, organizations, and individuals commenting on the Draft IS/MND; copies of the written comments received during the Draft IS/MND public review period; and the lead agency responses to those comments.

This Final IS/MND includes references to the following documents:

- Draft IS/MND (provided under separate cover) and circulated during the public review period, which ran from July 29, 2019 through August 30, 2019.
- Draft IS/MND appendices (provided under separate cover) and circulated during the public review period, which ran from July 29, 2019 through August 30, 2019.
- Errata and Responses to Written Comments (Sections 2 and 3 of this document).
- Mitigation Monitoring and Reporting Program (provided under separate cover) and circulated during the public review period, which ran from July 29, 2019 through August 30, 2019.

For reference purposes, the Draft IS/MND and appendices can be found online at <https://www.ladbs.org/docs/default-source/publications/lea/direct-disposal-transfer-processing-facility-draft-is-mnd-july-2019-complete-rev-1.pdf>

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SECTION 1 - CLARIFICATIONS AND MODIFICATIONS

The following clarifications and modifications are intended to update the Draft IS/MND in response to changes made to the proposed Project, due to editorial changes or as a result of a comment made by an agency or individual during the public review period. These changes constitute the Final IS/MND, to be considered by the City of Los Angeles Local Enforcement Agency for adoption. None of the changes to the IS/MND would require recirculation of the document. Revisions made to the IS/MND have not resulted in new significant impacts or mitigation measures, nor has the severity of an impact increased. None of the CEQA criteria for recirculation have been met, and recirculation of the IS/MND is not warranted.

The changes to the IS/MND are listed by section, page number, and paragraph number if applicable. Text which has been removed is shown with a ~~strike through~~ line, while text that has been added is underlined.

Draft IS/MND

Page No.	Clarification/Modification
3	<p>Section 1.6 “Proposed Project” - the following revision is made to the first sentence of the first paragraph in response to CalRecycle comment CR3:</p> <p>The proposed project entails an application for a Large Volume Solid Waste Facility Permit (SWFP) to allow expansion of the existing 175 ton per day (TPD) <u>Direct Disposal</u> Medium Volume Direct Disposal Construction, Demolition and Inert (CDI) Material Recovery Facility (MRF) (reference CalRecycle SWFP no. 19-AR-1228), located at 3720 Noakes Street in the City of Los Angeles.</p>
3	<p>Section 1.6 “Proposed Project” - the following revision is made to the third sentence of the third paragraph in response to CalRecycle comment CR5:</p> <p>Other improvements are proposed to increase operational efficiency and include opening new access doors on the east and west side of the building to improve vehicle circulation, material processing and material transfer, adding a low speed shredder for pre-processing incoming COD <u>C&D</u> material, adding screens, increasing bunker capacities and extending the sort line.</p>
3	<p>Section 1.6 “Proposed Project” - the following revision is made to the first sentence of the fourth paragraph of the Draft IS/MND:</p> <p>Future improvements may also include a vehicle queuing lane, a truck scale, scale house and <u>relocation of the office trailer offices at</u> to the 3719 Noakes Street property which will free up additional space at 3720 Noakes Street for material storage and processing. <u>The 3719 Noakes Street site will not be used for customer queuing, or storage/processing of MSW.</u></p>

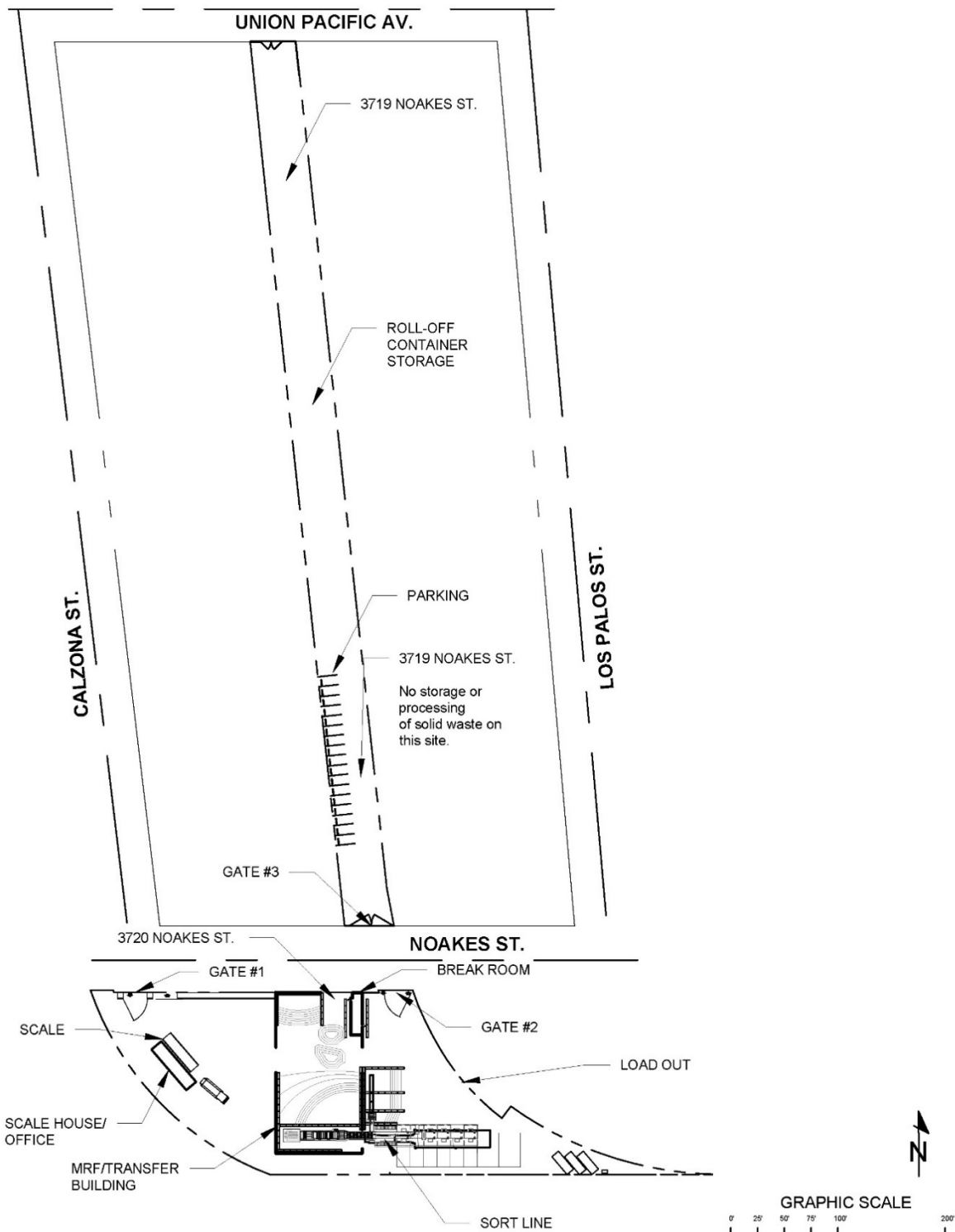
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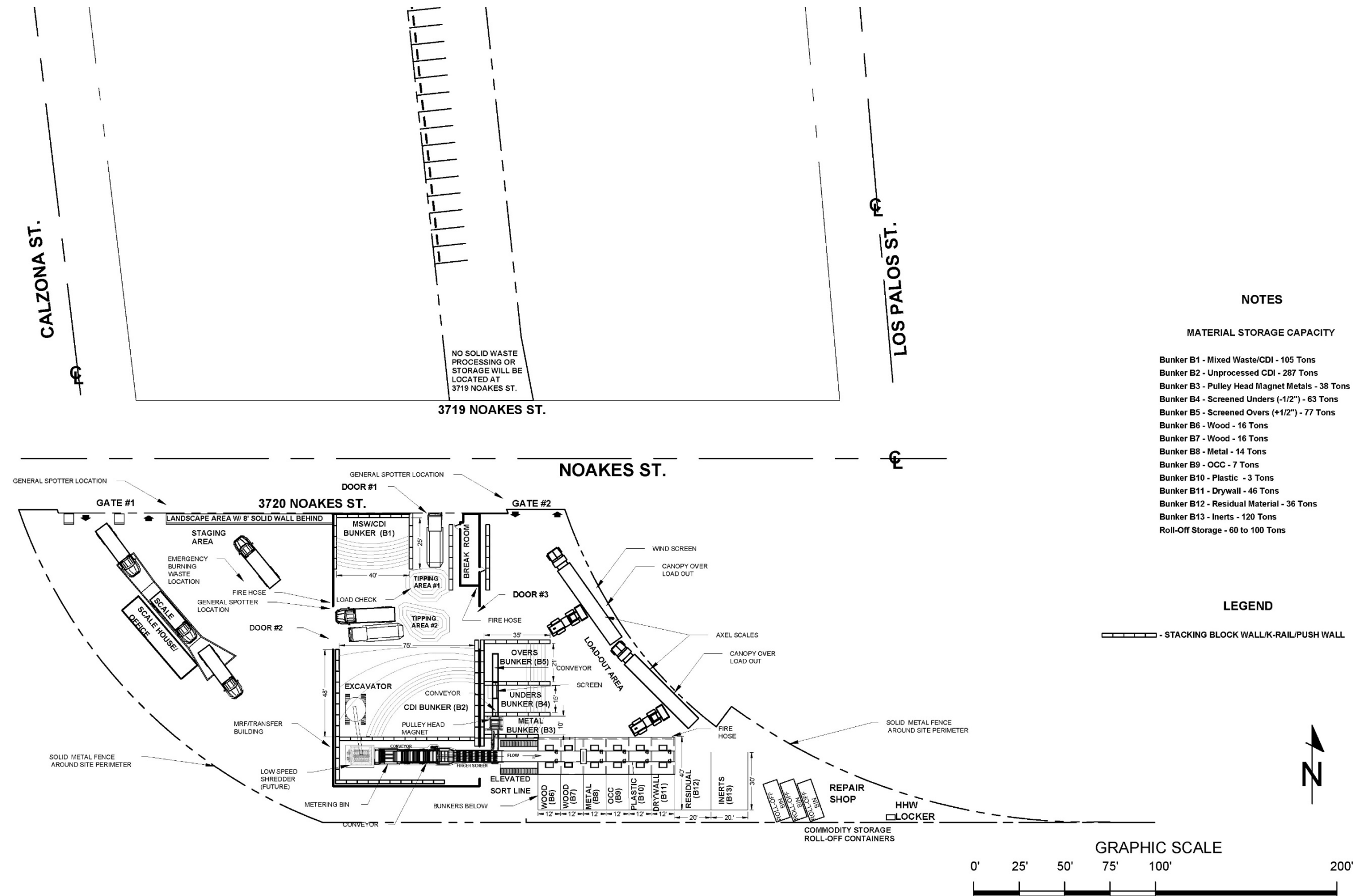
Figure 2 “Overall Site Plan” has been revised to remove the “vehicle staging area” note from the 3719 Noakes Street property. A note has also been added to indicate that no solid waste processing or storage will occur on the 3719 Noakes Street property.



Draft IS/MND
Page No.

Clarification/Modification

5 **Figure 3** “Site Plan” has been revised to eliminate the “staging area” note on the 3719 Noakes Street property and to show the repair shop area in response to CalRecycle comment CR6. A note has also been added to indicate that no solid waste processing or storage will occur on the 3719 Noakes Street property.



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Clarification/Modification

6

Section 1.6, “Proposed Project”. The following revision is made to the second sentence of the fifth paragraph of the Draft IS/MND in response to CalRecycle comment CR7: “The TPR has been prepared in accordance with Title 14, Section ~~18221~~ 18221.6 of the California Code of Regulations (CCR), which lists the specific requirements for inclusion in a TPR.

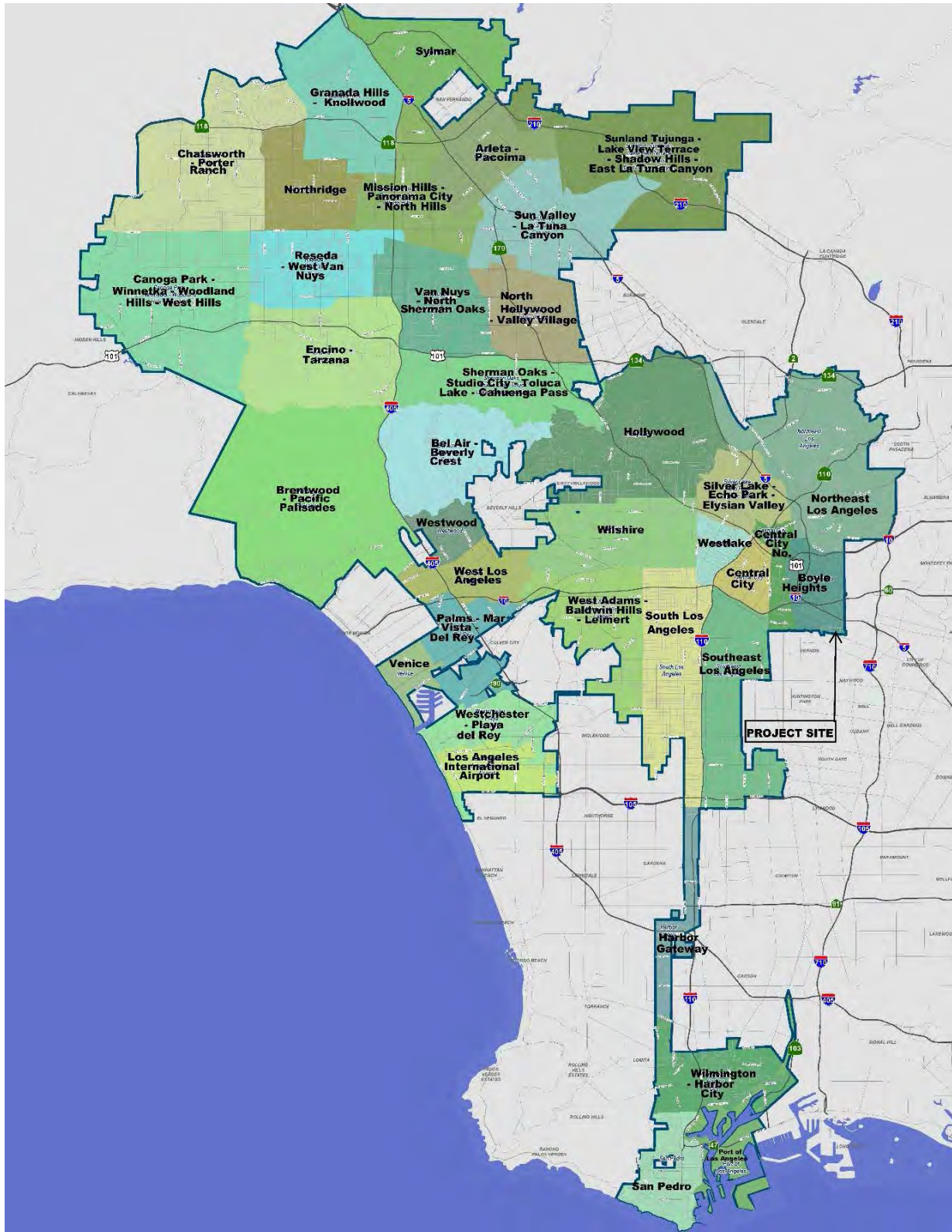
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Clarification/Modification

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Figure 4 “City-Wide Community Plan Map” is replaced by this higher resolution exhibit in response to CalRecycle comment CR8.



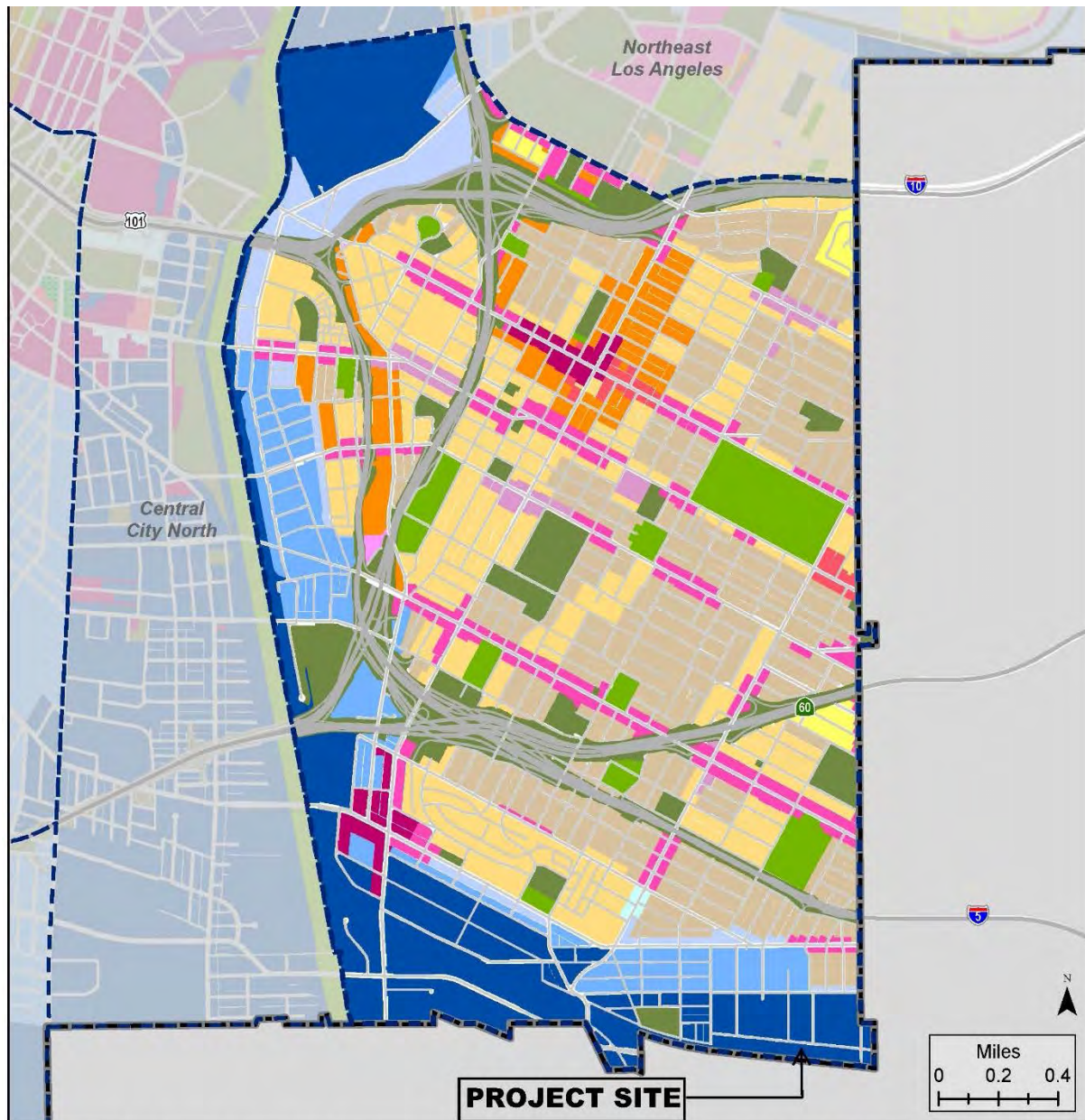
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Clarification/Modification

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Figure 5 “Boyle Heights Community Plan Map” is replaced by this higher resolution exhibit.



General Plan Land Use

Boyle Heights Community Plan Area



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Page No.

Clarification/Modification

- 9 Section 1.7, “General Plan and Zoning” reformat the second paragraph to make the second bullet point a separate paragraph in response to CalRecycle comment CR9, and reads as follows:

Los Angeles Municipal Code (LAMC) Section 12.21 A 18(e) states in part that Recycling Materials Sorting Facilities shall be permitted in the M3 Zone without obtaining a conditional use permit provided that:

- The facility shall be located at least 1,000 feet from an A, R, C, P, or PB Zoned property.

The Direct Disposal Recycling Material Recovery Facility and Transfer Station building is not located within 1,000 feet of an A, R, C, P, or PB Zoned property located in the City of LA or the City of Vernon as shown in **Figure 5**. Direct Disposal has been operating a CDI processing facility at the project location since 2004.

- 9 Section 1.8 “Background” is revised as follows: Direct Disposal, Inc. has been operating a CDI processing facility at the project location for over 14 years (since 2004) and has operated a medium volume ~~solid waste CDI processing and transfer~~ material recovery facility since 2008 under SWFP 19-AR-1228, processing up to 175 TPD of material.

- 13 In response to CalRecycle comment CR1 “Environmental Factors Potentially Affected” is revised to read: The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant” Unless Mitigation Incorporated Impact as indicated by the checklist on the following pages.

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture and Forestry Resources	<input checked="" type="checkbox"/> Air Quality
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Geology/Soils
<input type="checkbox"/> Greenhouse Gas Emissions	<input checked="" type="checkbox"/> Hazards and Hazardous Materials	<input checked="" type="checkbox"/> Hydrology/Water Quality
<input type="checkbox"/> Land Use Planning	<input type="checkbox"/> Mineral Resources	<input checked="" type="checkbox"/> Noise
<input type="checkbox"/> Population/Housing	<input checked="" type="checkbox"/> Public Services	<input type="checkbox"/> Recreation
<input type="checkbox"/> Transportation/Traffic	<input checked="" type="checkbox"/> Utilities/Service Systems	<input type="checkbox"/> Mandatory Findings of Significance

Draft IS/MND

Page No.	Clarification/Modification
19	<p>Section 3.3.b “Air Quality” regarding the project’s potential to “violate any air quality standard or contribute substantially to an existing or projected air quality violation” is revised from “Less Than Significant Impact” to “Potentially Significant Unless Mitigation Incorporated” in response to CalRecycle comment CR2 as mitigation measures were proposed at the time the Draft IS/MND was circulated.</p>
19	<p>Section 3.3.b “Air Quality” has been supplemented with an air quality analysis using the California Emission Estimator Model (CalEEMod) version 2016.3.2 as well as AQMD “Off-Road – Model Mobile Source Emission Factors”. Detailed worksheets are included in Appendix CM1 of this Final IS/MND, and the following is added after the second paragraph under Section 3.3.b:</p> <p><u>The proposed project will increase the number of vehicles using the facility as well as the running times for off-road diesel-powered equipment used to process material at the facility. As shown in Table CM-1, operational emissions would not exceed SCAQMD’s regional significance thresholds for VOC, NO_x, CO, PM₁₀, and PM_{2.5}. Therefore, the proposed project’s operational impacts on regional air quality are considered less than significant.</u></p> <p><u>In addition to regional thresholds, the SCAQMD has developed specific CEQA Local Significance Thresholds (LSTs) to assess operational air quality impacts associated with individual development projects. The LST values are specific to the source reduction area in which the individual project is located and based on proximity to the nearest sensitive receptor(s). LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. As shown in Table CM-1, Estimated Daily Operational Emissions – operational emissions would not exceed LSTs significance thresholds for NO_x, CO, PM₁₀, and PM_{2.5} emissions. Therefore, the proposed project’s operational impacts on LSTs are considered less than significant.</u></p>
21	<p>Section 3.3.e “Air Quality” regarding the project’s potential to “create objectionable odors affecting a substantial number of people” is revised from “Less Than Significant Impact” to “Potentially Significant unless Mitigation Incorporated” in response to CalRecycle comment CR2 as mitigation measures were proposed at the time the Draft IS/MND was circulated.</p>

TABLE CM-1 - PROJECT OPERATIONAL EMISSIONS

(With Mitigation Measures Incorporated)

	Project Emissions (pounds per day)								
	VOC	NOx	CO	SOx	PM10	PM 2.5	CO2	CH4	CO2E
EMISSION SOURCE									
<u>Material Tipping/Loading</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>1.80</u>	<u>0.27</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>2 Excavators</u>	<u>1.6126</u>	<u>8.8924</u>	<u>11.2728</u>	<u>0.0286</u>	<u>0.4048</u>	<u>0.401157</u>	<u>2640</u>	<u>0.1452</u>	<u>5335</u>
<u>3 Loaders</u>	<u>1.8072</u>	<u>11.3928</u>	<u>10.5744</u>	<u>0.0288</u>	<u>0.564</u>	<u>0.5589</u>	<u>2616</u>	<u>0.1632</u>	<u>6054</u>
<u>1 Telehandler</u>	<u>1.0164</u>	<u>7.15</u>	<u>4.9445</u>	<u>0.0165</u>	<u>0.2772</u>	<u>0.274705</u>	<u>1551</u>	<u>0.0913</u>	<u>3702</u>
<u>1- Skid Steer Loader</u>	<u>0.2442</u>	<u>1.77548</u>	<u>2.3375</u>	<u>0.0044</u>	<u>0.055</u>	<u>0.054505</u>	<u>333.3</u>	<u>0.022</u>	<u>871</u>
<u>Onsite Circulation Fugitive Dust</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>19.344</u>	<u>4.080</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Area</u>	<u>1.2069</u>	<u>0.00005</u>	<u>0.00555</u>	<u>0</u>	<u>0.00002</u>	<u>0.00002</u>	<u>0.0118</u>	<u>0.00003</u>	<u>0.0126</u>
<u>Energy</u>	<u>0.0289</u>	<u>0.2625</u>	<u>0.2205</u>	<u>0.00158</u>	<u>0.0200</u>	<u>0.0200</u>	<u>315.036</u>	<u>0.00604</u>	<u>316.9084</u>
<u>On-Road Mobile Emission</u>	<u>1.1409</u>	<u>25.0742</u>	<u>10.5071</u>	<u>0.0949</u>	<u>4.4758</u>	<u>1.3947</u>	<u>9,946.1609</u>	<u>0.3868</u>	<u>9955.8304</u>
TOTAL EMISSIONS	<u>7.0571</u>	<u>54.54743</u>	<u>39.86235</u>	<u>0.17478</u>	<u>26.94082</u>	<u>7.053987</u>	<u>17,401.5087</u>	<u>0.81457</u>	<u>26234.7514</u>
<u>Regional Threshold</u>	<u>55</u>	<u>55</u>	<u>550</u>	<u>150</u>	<u>150</u>	<u>55</u>	<u>-</u>	<u>-</u>	<u>-</u>
<u>SCAQMD Threshold Exceeded</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>-</u>	<u>-</u>	<u>-</u>
<u>Localized Significance Threshold</u>	<u>-</u>	<u>106</u>	<u>2,406</u>	<u>-</u>	<u>70</u>	<u>17</u>	<u>-</u>	<u>-</u>	<u>-</u>
<u>Localized Threshold Exceeded</u>		<u>NO</u>	<u>NO</u>		<u>NO</u>	<u>NO</u>	<u>-</u>	<u>-</u>	<u>-</u>

Localized Significance Threshold analysis based on 1-acre site with 200-meter distance to receptor in Central LA source receptor area based on CalEEMod 2016 3.2 model runs - Winter.

Draft IS/MND

Page No.

Clarification/Modification

- 21 Section 3.3.e “Air Quality”, mitigation measure AQ10 is revised as follows:
- All MSW, ~~greenwaste and organic material~~ received at the facility will be transferred out within 48 hours and within 24 hours if possible. Material will be processed on a first in, first out, basis.”
- Section 3.3.e “Air Quality”, mitigation measure AQ11 is revised as follows:
- Regular site inspections will be conducted by site supervisor(s) to assure that all ~~organic matter~~ MSW is removed as required, the facility is cleaned on a daily basis and to minimize any other source for odors on site.
- 34 Section 3.13.a “Public Services”, regarding the project’s potential to “result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services” is revised from “Less Than Significant Impact” to “Potentially Significant Unless Mitigation Incorporated” in response to CalRecycle comment CR2 as mitigation measures were proposed at the time the Draft IS/MND was circulated.
- 38 Section 3.16.f “Utilities and Service Systems”, regarding to the project’s impact on landfill capacity, is revised as follows:
- The proposed project would increase the maximum daily tonnage from 175 TPD to ~~400~~ 500 TPD and the classification from a Medium Volume Construction and Demolition/Inert Debris Processing (CDI) facility to a Large Volume solid waste facility. Facilities such as this divert material from the landfill through recycling.
- 38 Per CalRecycle’s comment CR2, the of the Draft IS/MND Checklist under Section 3.16 (Utilities and Service Systems), Subsection “g”, regarding to the project’s compliance “with federal, state, and local statutes and regulations related to solid waste”, is revised from “Less Than Significant Impact” to “Potentially Significant Unless Mitigation Incorporated” as mitigation measures were proposed at the time the Draft IS/MND was circulated.

Draft IS/MND

Appendix A

Page Nos.

Clarification/Modification

2, 3 and 10

Air Quality Mitigation Measures A10 and A11 in Table A-1 and Table A-2 of Appendix A of the Draft IS/MND are revised to read:

- A10. All MSW ~~greenwaste and organic material~~ received at the facility will be transferred out within 48 hours and within 24 hours if possible. Material will be processed on a first in, first out, basis.
- A11. Regular site inspections will be conducted by site supervisor(s) to assure that all ~~organic matter~~ MSW is removed as required, the facility is cleaned on a daily basis and to minimize any other source for odors on site.

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Appendix A

Page No.

Clarification/Modification

14

Table A-2 of Appendix A of the Draft IS/MND is revised to include mitigation measure HHM6 in response to CalRecycle comment CR10, which was omitted from the table, to read as follows:

Table A-2 Implementation of Mitigation Measures						
No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion	No.	Mitigation Measure
<u>HHM6</u>	<u>Records of load checks and the training of personnel in the recognition, proper handling, and disposition of prohibited waste, as well as a copy of the load checking program and copies of the load checking records for the prior year shall be maintained in the operating record and be available for review by the appropriate regulatory agencies.</u>	<u>The facility manager will maintain records regarding load checks and associated training.</u>	<u>Facility Operator</u>	<u>Ongoing</u>	<u>Load checks and associated training will be conducted as required under the Solid Waste Facility Permit.</u>	<u>Less than significant</u>

Draft IS/MND

Appendix A

Page No.

Clarification/Modification

16

Per CalRecycle’s comment CR-11, Mitigation Measure N-1 is corrected to read: “The project shall ~~company~~ comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574 and any subsequent ordinances, assist in minimizing potential noise impacts which prohibit the emissions or creation of noise beyond certain levels at adjacent uses unless technically infeasible.”

APPENDIX CM-I

AIR QUALITY MODELING WORKSHEETS

Emissions from Material Unloading and Loading

$$\text{Material Handling Emissions} = k * (0.0032) * \{ [U/5]^{1.3} / [M/2]^{1.4} \}$$

Category/Variable	Value	Units
Operating Days	312	
Tons of Material Handled/Year	116688	
326 Tons of Material Handled/4x Day	1304	
k for PM10	0.35	
k for PM 2.5	0.053	
U mean wind speed (Assumed)	10	mph
M moisture content	2	%
Constant	0.0032	lb/ton
Calculated Emission Factor - PM 2.5	0.000417604	lb/ton
Calculated Emission Factor - PM 10	0.002757763	lb/ton

	Uncontrolled Emission lbs/day	Controlled Emissions lbs/day ¹
Calculated Emissions - PM 2.5	0.544555857	0.272277929
Calculated Emissions - PM 10	3.596123586	1.798061793

¹ Controlled emissions - abatement efficiency 50% with water application to control dust.

Source - U.S.E.P.A. *Compilation of Air Pollutant Emission Factors, Volume 1. Stationary Point and Area Sources ("AP-42") 5th Ed., November 2006, Section 12.2.4.*

Emissions Calculations - Loaders

Hp	2020 Composite								
Hours of Operaton per Day	8								
Number	3								
Vehicle Speed (mph)	0.5								
Total Daily Miles	2.5								
Days/year	312								
	ROG	CO	NOx	SOx	PM10	PM2.5	CO2	CH4	CO2e
Emission Factor, lb/hr	0.0753	0.4406	0.4747	0.0012	0.0235	0.023289	109	0.0068	
Emissions, lb/day	1.8072	10.5744	11.3928	0.0288	0.564	0.558924	2616	0.1632	6054

¹ PM 2.5 as a percentage of PM10 0.991

² Per EPA Greenhouse Gas Equivalencies Calculator - <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

³ Emission Factors Per SCAQMD Off-Road - Model Mobile Source Emission Factors for Model Year 2019 Equipment

Emissions Calculations - Bobcat (skid steer loader)

Hp	2020 Composite								
Hours of Operaton per Day	11								
Number	1								
Vehicle Speed (mph)	0.5								
Total Daily Miles	2.5								
Days/year	312								
	ROG	CO	NOx	SOx	PM10	PM2.5	CO2	CH4	CO2e
Emission Factor, lb/hr	0.0222	0.2125	0.1614	0.0004	0.005	0.004955	30.3	0.002	
Emissions, lb/day	0.2442	2.3375	1.7754	0.0044	0.055	0.054505	333.3	0.022	871

Emissions Calculations - Telehandler

Hp	(2020 Other Material Handling Equipment Composite)								
Hours of Operaton per Day	11								
Number	1								
Vehicle Speed (mph)	0.5								
Total Daily Miles	5								
Days/year	312								
	ROG	CO	NOx	SOx	PM10	PM2.5¹	CO2	CH4	CO2e²
Emission Factor, lbs/hr ³	0.0924	0.4495	0.65	0.0015	0.0252	0.024973	141	0.0083	
Emissions, lb/day	1.0164	4.9445	7.15	0.0165	0.2772	0.274705	1551	0.0913	3702

¹ PM 2.5 as a percentage of PM10 0.991

² Per EPA Greenhouse Gas Equivalencies Calculator - <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

³ Emission Factors Per SCAQMD Off-Road - Model Mobile Source Emission Factors for Model Year 2019 Equipment

Emissions Calculations - Excavators

Hp	2020 Composite								
Hours of Operaton per Day	11								
Number	2								
Vehicle Speed (mph)	0.5								
Total Daily Miles	2.5								
Days/year	312								
	ROG	CO	NOx	SOx	PM10	PM2.5	CO2	CH4	CO2e
Emission Factor, lb/hr	0.0733	0.5124	0.4042	0.0013	0.0184	0.018234	120	0.0066	
Emissions, lb/day	1.6126	11.2728	8.8924	0.0286	0.4048	0.401157	2640	0.1452	5335

TOTAL OFF-ROAD EMISSIONS

ROG	CO	NOx	SOx	PM10	PM2.5	CO2	CH4	CO2e
4.6804	29.1292	29.2106	0.0783	0.737	1.289291	7140.3	0.4217	15962

¹ PM 2.5 as a percentage of PM10 0.991

² Per EPA Greenhouse Gas Equivalencies Calculator - <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

³ Emission Factors Per SCAQMD Off-Road - Model Mobile Source Emission Factors for Model Year 2019 Equipment

Fugitive Dust Emissions from Onsite Vehicle Travel

Vehicle Traffic Emissions

PM10 Paved Road EF (lb/vmt)	0.079
PM10 Unpaved Road EF (lb/vmt)	0.93
PM2.5 Paved Road EF (lb/vmt)	0.016748
PM2.5 Unpaved Road EF (lb/vmt)	0.19716

PM10 Emissions, lbs/day PM2.5 Emissions, lbs/day

Emissions Calculations - Offroad *

		Unpaved MPD		
Telehandler		5	4.65	0.9858
Excavator		3	2.79	0.59148
Loaders		10	9.3	1.9716
Skid Steer		3	2.79	0.550076
Customer Vehicles	109	20.6	19.158	4.061496
		TOTALS	38.688	8.160452
		Reduction from dust control with water - 50%	19.344	4.080226

Self Haul Trips Per Day 94
 Transfer Truck Trips 15
 Total Trips 109
 Onsite travel distance = 1,000 foot/trip
 109 trips x 1,000 = 109,000

109,000 feet/5,280 = 20.6 mi

Direct - South Coast AQMD Air District, Winter

Direct
South Coast AQMD Air District, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	54.00	1000sqft	1.24	54,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	12			Operational Year	2020
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MW hr)	1227.89	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

- Project Characteristics -
- Land Use -
- Construction Phase - No construction
- Off-road Equipment - No construction
- Trips and VMT - No construction
- Vehicle Trips - Per traffic study
- Operational Off-Road Equipment - Solid waste facility permit
- Fleet Mix - Per traffic study

Direct - South Coast AQMD Air District, Winter

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.03	0.20
tblFleetMix	LDA	0.55	0.20
tblFleetMix	LDT1	0.04	0.00
tblFleetMix	LDT2	0.20	0.00
tblFleetMix	LHD1	0.02	0.20
tblFleetMix	LHD2	5.8620e-003	0.20
tblFleetMix	MCY	4.7770e-003	0.00
tblFleetMix	MDV	0.12	0.00
tblFleetMix	MH	9.5600e-004	0.00
tblFleetMix	MHD	0.02	0.20
tblFleetMix	OBUS	2.0370e-003	0.00
tblFleetMix	SBUS	7.0500e-004	0.00
tblFleetMix	UBUS	1.9440e-003	0.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	300.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	300.00
tblOperationalOffRoadEquipment	OperHorsePower	203.00	0.00
tblOperationalOffRoadEquipment	OperHorsePower	65.00	0.00
tblOperationalOffRoadEquipment	OperLoadFactor	0.36	0.95
tblOperationalOffRoadEquipment	OperLoadFactor	0.37	0.95
tblVehicleTrips	CC_TL	8.40	20.00
tblVehicleTrips	CC_TTP	28.00	80.00
tblVehicleTrips	CNW_TTP	13.00	5.00
tblVehicleTrips	CW_TTP	59.00	15.00
tblVehicleTrips	DV_TP	5.00	2.50
tblVehicleTrips	PB_TP	3.00	2.50
tblVehicleTrips	PR_TP	92.00	95.00

Direct - South Coast AQMD Air District, Winter

tblVehicleTrips	ST_TR	1.50	5.07
tblVehicleTrips	SU_TR	1.50	0.00
tblVehicleTrips	WD_TR	1.50	5.07

2.0 Emissions Summary

Direct - South Coast AQMD Air District, Winter

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	2.3643	22.7236	15.4213	0.0255	0.1453	1.2874	1.4327	0.0385	1.2028	1.2413	0.0000	2,504.3250	2,504.3250	0.6056	0.0000	2,519.4649
2020	50.3249	20.9896	15.1358	0.0268	5.8890	1.1536	6.7106	2.9774	1.0772	3.7333	0.0000	2,487.2050	2,487.2050	0.6009	0.0000	2,497.0851
Maximum	50.3249	22.7236	15.4213	0.0268	5.8890	1.2874	6.7106	2.9774	1.2028	3.7333	0.0000	2,504.3250	2,504.3250	0.6056	0.0000	2,519.4649

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	2.3643	22.7236	15.4213	0.0255	0.1453	1.2874	1.4327	0.0385	1.2028	1.2413	0.0000	2,504.3250	2,504.3250	0.6056	0.0000	2,519.4649
2020	50.3249	20.9896	15.1358	0.0268	5.8890	1.1536	6.7106	2.9774	1.0772	3.7333	0.0000	2,487.2050	2,487.2050	0.6009	0.0000	2,497.0851
Maximum	50.3249	22.7236	15.4213	0.0268	5.8890	1.2874	6.7106	2.9774	1.2028	3.7333	0.0000	2,504.3250	2,504.3250	0.6056	0.0000	2,519.4649

[illegible]

Direct - South Coast AQMD Air District, Winter

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Energy	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Mobile	1.1409	25.0742	10.5071	0.0949	4.2804	0.1954	4.4758	1.2081	0.1866	1.3947		9,946.1609	9,946.1609	0.3868		9,955.8304
Total	2.3766	25.3368	10.7331	0.0964	4.2804	0.2153	4.4957	1.2081	0.2066	1.4147		10,261.2090	10,261.2090	0.3929	5.7800e-003	10,272.7513

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Energy	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Mobile	1.1409	25.0742	10.5071	0.0949	4.2804	0.1954	4.4758	1.2081	0.1866	1.3947		9,946.1609	9,946.1609	0.3868		9,955.8304
Total	2.3766	25.3368	10.7331	0.0964	4.2804	0.2153	4.4957	1.2081	0.2066	1.4147		10,261.2090	10,261.2090	0.3929	5.7800e-003	10,272.7513

Direct - South Coast AQMD Air District, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	12/31/2019	1/27/2020	5	20	
2	Site Preparation	Site Preparation	1/28/2020	1/29/2020	5	2	
3	Grading	Grading	1/30/2020	2/4/2020	5	4	
4	Building Construction	Building Construction	2/5/2020	11/10/2020	5	200	
5	Paving	Paving	11/11/2020	11/24/2020	5	10	
6	Architectural Coating	Architectural Coating	11/25/2020	12/8/2020	5	10	

Acres of Grading (Site Preparation Phase): 1**Acres of Grading (Grading Phase): 1.5****Acres of Paving: 0****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 81,000; Non-Residential Outdoor: 27,000; Striped Parking Area: 0 (Architectural Coating – sqft)****OffRoad Equipment**

Direct - South Coast AQMD Air District, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Paving	Pavers	1	6.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Direct - South Coast AQMD Air District, Winter

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	23.00	9.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017		2,360.7198	2,360.7198	0.6011		2,375.7475
Total	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017		2,360.7198	2,360.7198	0.6011		2,375.7475

Direct - South Coast AQMD Air District, Winter

3.2 Demolition - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0693	0.0485	0.5270	1.4400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		143.6053	143.6053	4.4900e-003		143.7174
Total	0.0693	0.0485	0.5270	1.4400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		143.6053	143.6053	4.4900e-003		143.7174

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017	0.0000	2,360.7197	2,360.7197	0.6011		2,375.7475
Total	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017	0.0000	2,360.7197	2,360.7197	0.6011		2,375.7475

Direct - South Coast AQMD Air District, Winter

3.2 Demolition - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0693	0.0485	0.5270	1.4400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		143.6053	143.6053	4.4900e-003		143.7174
Total	0.0693	0.0485	0.5270	1.4400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		143.6053	143.6053	4.4900e-003		143.7174

3.2 Demolition - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761		2,322.3127	2,322.3127	0.5970		2,337.2363
Total	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761		2,322.3127	2,322.3127	0.5970		2,337.2363

Direct - South Coast AQMD Air District, Winter

3.2 Demolition - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761	0.0000	2,322.3127	2,322.3127	0.5970		2,337.2363
Total	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761	0.0000	2,322.3127	2,322.3127	0.5970		2,337.2363

Direct - South Coast AQMD Air District, Winter

3.2 Demolition - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472

3.3 Site Preparation - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7996	0.0000	5.7996	2.9537	0.0000	2.9537			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553		1,667.4119	1,667.4119	0.5393		1,680.8937
Total	1.6299	18.3464	7.7093	0.0172	5.7996	0.8210	6.6205	2.9537	0.7553	3.7090		1,667.4119	1,667.4119	0.5393		1,680.8937

Direct - South Coast AQMD Air District, Winter

3.3 Site Preparation - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7996	0.0000	5.7996	2.9537	0.0000	2.9537			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937
Total	1.6299	18.3464	7.7093	0.0172	5.7996	0.8210	6.6205	2.9537	0.7553	3.7090	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937

Direct - South Coast AQMD Air District, Winter

3.3 Site Preparation - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906

3.4 Grading - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.9143	0.0000	4.9143	2.5256	0.0000	2.5256			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296		1,365.7183	1,365.7183	0.4417		1,376.7609
Total	1.3498	15.0854	6.4543	0.0141	4.9143	0.6844	5.5986	2.5256	0.6296	3.1552		1,365.7183	1,365.7183	0.4417		1,376.7609

Direct - South Coast AQMD Air District, Winter

3.4 Grading - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.9143	0.0000	4.9143	2.5256	0.0000	2.5256			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296	0.0000	1,365.7183	1,365.7183	0.4417		1,376.7609
Total	1.3498	15.0854	6.4543	0.0141	4.9143	0.6844	5.5986	2.5256	0.6296	3.1552	0.0000	1,365.7183	1,365.7183	0.4417		1,376.7609

Direct - South Coast AQMD Air District, Winter

3.4 Grading - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906

3.5 Building Construction - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688		2,001.1595	2,001.1595	0.3715		2,010.4467
Total	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688		2,001.1595	2,001.1595	0.3715		2,010.4467

Direct - South Coast AQMD Air District, Winter

3.5 Building Construction - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0310	0.9434	0.2507	2.2500e-003	0.0576	4.7500e-003	0.0624	0.0166	4.5400e-003	0.0211		239.8615	239.8615	0.0167		240.2779
Worker	0.1135	0.0766	0.8466	2.4700e-003	0.2571	1.9500e-003	0.2590	0.0682	1.8000e-003	0.0700		246.1839	246.1839	7.0600e-003		246.3605
Total	0.1445	1.0200	1.0973	4.7200e-003	0.3147	6.7000e-003	0.3214	0.0848	6.3400e-003	0.0911		486.0455	486.0455	0.0237		486.6384

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688	0.0000	2,001.1595	2,001.1595	0.3715		2,010.4467
Total	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688	0.0000	2,001.1595	2,001.1595	0.3715		2,010.4467

Direct - South Coast AQMD Air District, Winter

3.5 Building Construction - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0310	0.9434	0.2507	2.2500e-003	0.0576	4.7500e-003	0.0624	0.0166	4.5400e-003	0.0211		239.8615	239.8615	0.0167		240.2779
Worker	0.1135	0.0766	0.8466	2.4700e-003	0.2571	1.9500e-003	0.2590	0.0682	1.8000e-003	0.0700		246.1839	246.1839	7.0600e-003		246.3605
Total	0.1445	1.0200	1.0973	4.7200e-003	0.3147	6.7000e-003	0.3214	0.0848	6.3400e-003	0.0911		486.0455	486.0455	0.0237		486.6384

3.6 Paving - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328		1,296.9461	1,296.9461	0.4111		1,307.2246
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328		1,296.9461	1,296.9461	0.4111		1,307.2246

Direct - South Coast AQMD Air District, Winter

3.6 Paving - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328	0.0000	1,296.9461	1,296.9461	0.4111		1,307.2246
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328	0.0000	1,296.9461	1,296.9461	0.4111		1,307.2246

Direct - South Coast AQMD Air District, Winter

3.6 Paving - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472

3.7 Architectural Coating - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	50.0580					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	50.3002	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928

Direct - South Coast AQMD Air District, Winter

3.7 Architectural Coating - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0247	0.0167	0.1840	5.4000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		53.5183	53.5183	1.5300e-003		53.5566
Total	0.0247	0.0167	0.1840	5.4000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		53.5183	53.5183	1.5300e-003		53.5566

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	50.0580					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928
Total	50.3002	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928

Direct - South Coast AQMD Air District, Winter

3.7 Architectural Coating - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0247	0.0167	0.1840	5.4000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		53.5183	53.5183	1.5300e-003		53.5566
Total	0.0247	0.0167	0.1840	5.4000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		53.5183	53.5183	1.5300e-003		53.5566

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

Direct - South Coast AQMD Air District, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.1409	25.0742	10.5071	0.0949	4.2804	0.1954	4.4758	1.2081	0.1866	1.3947		9,946.1609	9,946.1609	0.3868		9,955.8304
Unmitigated	1.1409	25.0742	10.5071	0.0949	4.2804	0.1954	4.4758	1.2081	0.1866	1.3947		9,946.1609	9,946.1609	0.3868		9,955.8304

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Heavy Industry	273.78	273.78	0.00	1,538,699	1,538,699
Total	273.78	273.78	0.00	1,538,699	1,538,699

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Heavy Industry	16.60	20.00	6.90	15.00	80.00	5.00	95	2.5	2.5

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Heavy Industry	0.200000	0.000000	0.000000	0.000000	0.200000	0.200000	0.200000	0.200000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Direct - South Coast AQMD Air District, Winter

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
NaturalGas Unmitigated	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084

5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	2677.81	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Total		0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084

Direct - South Coast AQMD Air District, Winter

5.2 Energy by Land Use - NaturalGas**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	2.67781	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Total		0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084

6.0 Area Detail**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Unmitigated	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126

Direct - South Coast AQMD Air District, Winter

6.2 Area by SubCategory**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1372					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0692					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.2000e-004	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Total	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1372					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0692					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.2000e-004	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Total	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126

Direct - South Coast AQMD Air District, Winter

7.0 Water Detail**7.1 Mitigation Measures Water**

8.0 Waste Detail**8.1 Mitigation Measures Waste**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Rubber Tired Loaders	0	8.00	300	0	0.95	Diesel
Skid Steer Loaders	0	8.00	300	0	0.95	Diesel

10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Direct - South Coast AQMD Air District, Summer

Direct**South Coast AQMD Air District, Summer****1.0 Project Characteristics**

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	54.00	1000sqft	1.24	54,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	12			Operational Year	2020
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MW hr)	1227.89	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Construction Phase - No construction

Off-road Equipment - No construction

Trips and VMT - No construction

Vehicle Trips - Per traffic study

Operational Off-Road Equipment - Solid waste facility permit

Fleet Mix - Per traffic study

Direct - South Coast AQMD Air District, Summer

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.03	0.20
tblFleetMix	LDA	0.55	0.20
tblFleetMix	LDT1	0.04	0.00
tblFleetMix	LDT2	0.20	0.00
tblFleetMix	LHD1	0.02	0.20
tblFleetMix	LHD2	5.8620e-003	0.20
tblFleetMix	MCY	4.7770e-003	0.00
tblFleetMix	MDV	0.12	0.00
tblFleetMix	MH	9.5600e-004	0.00
tblFleetMix	MHD	0.02	0.20
tblFleetMix	OBUS	2.0370e-003	0.00
tblFleetMix	SBUS	7.0500e-004	0.00
tblFleetMix	UBUS	1.9440e-003	0.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	300.00
tblOperationalOffRoadEquipment	OperDaysPerYear	260.00	300.00
tblOperationalOffRoadEquipment	OperHorsePower	203.00	0.00
tblOperationalOffRoadEquipment	OperHorsePower	65.00	0.00
tblOperationalOffRoadEquipment	OperLoadFactor	0.36	0.95
tblOperationalOffRoadEquipment	OperLoadFactor	0.37	0.95
tblVehicleTrips	CC_TL	8.40	20.00
tblVehicleTrips	CC_TTP	28.00	80.00
tblVehicleTrips	CNW_TTP	13.00	5.00
tblVehicleTrips	CW_TTP	59.00	15.00
tblVehicleTrips	DV_TP	5.00	2.50
tblVehicleTrips	PB_TP	3.00	2.50
tblVehicleTrips	PR_TP	92.00	95.00

Direct - South Coast AQMD Air District, Summer

tblVehicleTrips	ST_TR	1.50	5.07
tblVehicleTrips	SU_TR	1.50	0.00
tblVehicleTrips	WD_TR	1.50	5.07

2.0 Emissions Summary

Direct - South Coast AQMD Air District, Summer

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	2.3587	22.7194	15.4785	0.0256	0.1453	1.2874	1.4327	0.0385	1.2028	1.2413	0.0000	2,514.2483	2,514.2483	0.6059	0.0000	2,529.3961
2020	50.3228	20.9858	15.1887	0.0270	5.8890	1.1536	6.7106	2.9774	1.0772	3.7333	0.0000	2,511.3791	2,511.3791	0.6012	0.0000	2,521.2432
Maximum	50.3228	22.7194	15.4785	0.0270	5.8890	1.2874	6.7106	2.9774	1.2028	3.7333	0.0000	2,514.2483	2,514.2483	0.6059	0.0000	2,529.3961

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	2.3587	22.7194	15.4785	0.0256	0.1453	1.2874	1.4327	0.0385	1.2028	1.2413	0.0000	2,514.2483	2,514.2483	0.6059	0.0000	2,529.3961
2020	50.3228	20.9858	15.1887	0.0270	5.8890	1.1536	6.7106	2.9774	1.0772	3.7333	0.0000	2,511.3791	2,511.3791	0.6012	0.0000	2,521.2432
Maximum	50.3228	22.7194	15.4785	0.0270	5.8890	1.2874	6.7106	2.9774	1.2028	3.7333	0.0000	2,514.2483	2,514.2483	0.6059	0.0000	2,529.3961

[illegible]

Direct - South Coast AQMD Air District, Summer

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Energy	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Mobile	1.1264	24.5123	10.4458	0.0961	4.2804	0.1945	4.4749	1.2081	0.1858	1.3939		10,077.1191	10,077.1191	0.3750		10,086.4935
Total	2.3622	24.7749	10.6719	0.0977	4.2804	0.2145	4.4949	1.2081	0.2058	1.4138		10,392.1672	10,392.1672	0.3810	5.7800e-003	10,403.4145

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Energy	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Mobile	1.1264	24.5123	10.4458	0.0961	4.2804	0.1945	4.4749	1.2081	0.1858	1.3939		10,077.1191	10,077.1191	0.3750		10,086.4935
Total	2.3622	24.7749	10.6719	0.0977	4.2804	0.2145	4.4949	1.2081	0.2058	1.4138		10,392.1672	10,392.1672	0.3810	5.7800e-003	10,403.4145

Direct - South Coast AQMD Air District, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	12/31/2019	1/27/2020	5	20	
2	Site Preparation	Site Preparation	1/28/2020	1/29/2020	5	2	
3	Grading	Grading	1/30/2020	2/4/2020	5	4	
4	Building Construction	Building Construction	2/5/2020	11/10/2020	5	200	
5	Paving	Paving	11/11/2020	11/24/2020	5	10	
6	Architectural Coating	Architectural Coating	11/25/2020	12/8/2020	5	10	

Acres of Grading (Site Preparation Phase): 1**Acres of Grading (Grading Phase): 1.5****Acres of Paving: 0****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 81,000; Non-Residential Outdoor: 27,000; Striped Parking Area: 0 (Architectural Coating – sqft)****OffRoad Equipment**

Direct - South Coast AQMD Air District, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Paving	Pavers	1	6.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Direct - South Coast AQMD Air District, Summer

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	23.00	9.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017		2,360.7198	2,360.7198	0.6011		2,375.7475
Total	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017		2,360.7198	2,360.7198	0.6011		2,375.7475

Direct - South Coast AQMD Air District, Summer

3.2 Demolition - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0637	0.0443	0.5841	1.5400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		153.5286	153.5286	4.8000e-003		153.6486
Total	0.0637	0.0443	0.5841	1.5400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		153.5286	153.5286	4.8000e-003		153.6486

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017	0.0000	2,360.7197	2,360.7197	0.6011		2,375.7475
Total	2.2950	22.6751	14.8943	0.0241		1.2863	1.2863		1.2017	1.2017	0.0000	2,360.7197	2,360.7197	0.6011		2,375.7475

Direct - South Coast AQMD Air District, Summer

3.2 Demolition - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0637	0.0443	0.5841	1.5400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		153.5286	153.5286	4.8000e-003		153.6486
Total	0.0637	0.0443	0.5841	1.5400e-003	0.1453	1.1300e-003	0.1464	0.0385	1.0400e-003	0.0396		153.5286	153.5286	4.8000e-003		153.6486

3.2 Demolition - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761		2,322.3127	2,322.3127	0.5970		2,337.2363
Total	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761		2,322.3127	2,322.3127	0.5970		2,337.2363

Direct - South Coast AQMD Air District, Summer

3.2 Demolition - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761	0.0000	2,322.3127	2,322.3127	0.5970		2,337.2363
Total	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761	0.0000	2,322.3127	2,322.3127	0.5970		2,337.2363

Direct - South Coast AQMD Air District, Summer

3.2 Demolition - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812

3.3 Site Preparation - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7996	0.0000	5.7996	2.9537	0.0000	2.9537			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553		1,667.4119	1,667.4119	0.5393		1,680.8937
Total	1.6299	18.3464	7.7093	0.0172	5.7996	0.8210	6.6205	2.9537	0.7553	3.7090		1,667.4119	1,667.4119	0.5393		1,680.8937

Direct - South Coast AQMD Air District, Summer

3.3 Site Preparation - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7996	0.0000	5.7996	2.9537	0.0000	2.9537			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937
Total	1.6299	18.3464	7.7093	0.0172	5.7996	0.8210	6.6205	2.9537	0.7553	3.7090	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937

Direct - South Coast AQMD Air District, Summer

3.3 Site Preparation - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192

3.4 Grading - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.9143	0.0000	4.9143	2.5256	0.0000	2.5256			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296		1,365.7183	1,365.7183	0.4417		1,376.7609
Total	1.3498	15.0854	6.4543	0.0141	4.9143	0.6844	5.5986	2.5256	0.6296	3.1552		1,365.7183	1,365.7183	0.4417		1,376.7609

Direct - South Coast AQMD Air District, Summer

3.4 Grading - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.9143	0.0000	4.9143	2.5256	0.0000	2.5256			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296	0.0000	1,365.7183	1,365.7183	0.4417		1,376.7609
Total	1.3498	15.0854	6.4543	0.0141	4.9143	0.6844	5.5986	2.5256	0.6296	3.1552	0.0000	1,365.7183	1,365.7183	0.4417		1,376.7609

Direct - South Coast AQMD Air District, Summer

3.4 Grading - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192

3.5 Building Construction - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688		2,001.1595	2,001.1595	0.3715		2,010.4467
Total	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688		2,001.1595	2,001.1595	0.3715		2,010.4467

Direct - South Coast AQMD Air District, Summer

3.5 Building Construction - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0296	0.9444	0.2249	2.3200e-003	0.0576	4.6800e-003	0.0623	0.0166	4.4800e-003	0.0211		247.0036	247.0036	0.0155		247.3913
Worker	0.1041	0.0700	0.9403	2.6400e-003	0.2571	1.9500e-003	0.2590	0.0682	1.8000e-003	0.0700		263.2160	263.2160	7.5700e-003		263.4052
Total	0.1336	1.0144	1.1652	4.9600e-003	0.3147	6.6300e-003	0.3213	0.0848	6.2800e-003	0.0910		510.2196	510.2196	0.0231		510.7965

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688	0.0000	2,001.1595	2,001.1595	0.3715		2,010.4467
Total	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688	0.0000	2,001.1595	2,001.1595	0.3715		2,010.4467

Direct - South Coast AQMD Air District, Summer

3.5 Building Construction - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0296	0.9444	0.2249	2.3200e-003	0.0576	4.6800e-003	0.0623	0.0166	4.4800e-003	0.0211		247.0036	247.0036	0.0155		247.3913
Worker	0.1041	0.0700	0.9403	2.6400e-003	0.2571	1.9500e-003	0.2590	0.0682	1.8000e-003	0.0700		263.2160	263.2160	7.5700e-003		263.4052
Total	0.1336	1.0144	1.1652	4.9600e-003	0.3147	6.6300e-003	0.3213	0.0848	6.2800e-003	0.0910		510.2196	510.2196	0.0231		510.7965

3.6 Paving - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328		1,296.9461	1,296.9461	0.4111		1,307.2246
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328		1,296.9461	1,296.9461	0.4111		1,307.2246

Direct - South Coast AQMD Air District, Summer

3.6 Paving - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328	0.0000	1,296.9461	1,296.9461	0.4111		1,307.2246
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.8402	8.4514	8.8758	0.0135		0.4695	0.4695		0.4328	0.4328	0.0000	1,296.9461	1,296.9461	0.4111		1,307.2246

Direct - South Coast AQMD Air District, Summer

3.6 Paving - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812

3.7 Architectural Coating - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	50.0580					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	50.3002	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928

Direct - South Coast AQMD Air District, Summer

3.7 Architectural Coating - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0226	0.0152	0.2044	5.7000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		57.2209	57.2209	1.6500e-003		57.2620
Total	0.0226	0.0152	0.2044	5.7000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		57.2209	57.2209	1.6500e-003		57.2620

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	50.0580					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928
Total	50.3002	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928

Direct - South Coast AQMD Air District, Summer

3.7 Architectural Coating - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0226	0.0152	0.2044	5.7000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		57.2209	57.2209	1.6500e-003		57.2620
Total	0.0226	0.0152	0.2044	5.7000e-004	0.0559	4.2000e-004	0.0563	0.0148	3.9000e-004	0.0152		57.2209	57.2209	1.6500e-003		57.2620

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

Direct - South Coast AQMD Air District, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.1264	24.5123	10.4458	0.0961	4.2804	0.1945	4.4749	1.2081	0.1858	1.3939		10,077.119 1	10,077.119 1	0.3750		10,086.493 5
Unmitigated	1.1264	24.5123	10.4458	0.0961	4.2804	0.1945	4.4749	1.2081	0.1858	1.3939		10,077.119 1	10,077.119 1	0.3750		10,086.493 5

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Heavy Industry	273.78	273.78	0.00	1,538,699	1,538,699
Total	273.78	273.78	0.00	1,538,699	1,538,699

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Heavy Industry	16.60	20.00	6.90	15.00	80.00	5.00	95	2.5	2.5

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Heavy Industry	0.200000	0.000000	0.000000	0.000000	0.200000	0.200000	0.200000	0.200000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Direct - South Coast AQMD Air District, Summer

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
NaturalGas Unmitigated	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084

5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	2677.81	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Total		0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084

Direct - South Coast AQMD Air District, Summer

5.2 Energy by Land Use - NaturalGas**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	2.67781	0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084
Total		0.0289	0.2625	0.2205	1.5800e-003		0.0200	0.0200		0.0200	0.0200		315.0363	315.0363	6.0400e-003	5.7800e-003	316.9084

6.0 Area Detail**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Unmitigated	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126

Direct - South Coast AQMD Air District, Summer

6.2 Area by SubCategory**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1372					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0692					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.2000e-004	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Total	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.1372					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0692					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.2000e-004	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126
Total	1.2069	5.0000e-005	5.5500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0118	0.0118	3.0000e-005		0.0126

Direct - South Coast AQMD Air District, Summer

7.0 Water Detail**7.1 Mitigation Measures Water**

8.0 Waste Detail**8.1 Mitigation Measures Waste**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Rubber Tired Loaders	0	8.00	300	0	0.95	Diesel
Skid Steer Loaders	0	8.00	300	0	0.95	Diesel

10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

SECTION 2 - RESPONSE TO COMMENTS ON THE DRAFT IS/MND

A. INTRODUCTION

The Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Draft IS/MND was circulated for public review and comment by the City of Los Angeles on July 29, 2019, initiating a 30-day public review period pursuant to CEQA and its implementing guidelines. The Notice of Intent/Notice of Availability was also distributed to relevant agencies and organizations, as well as property owners and occupants within 500 feet of the project site. Additionally, the Draft IS/MND was available for review at the Robert Louis Stevenson Branch Library, Council District 14 Office, and the LEA offices. The Draft IS/MND was also available online at the LEA website.

During this public review period, five (5) comment letters and one (1) comment email were received, as shown in **Table RTC-1** on the following page. Each comment letter has been assigned a number code, and individual comments in each letter have been coded to facilitate responses. For example, the letter from the California Department Resources Recovery and Recycling (CalRecycle) is identified as Letter CR, with comments noted as CR-1, CR-2, CR-3, etc. Copies of each comment letter are provided prior to the response to each letter. Comments that raise issues not directly related to the substance of the environmental analysis in the IS/MND are noted but, in accordance with CEQA, did not receive a detailed response.

B. RESPONSES TO WRITTEN COMMENTS

The written comment letters received on the Draft IS/MND are listed in Table RTC-1. The comments and associated responses are arranged by the date of receipt of the comment letter or email. The individual comments in the letters have been numbered and are referred to in the responses that directly follow the comment letter.

TABLE RTC-1			
Letter Reference	Agency/Organization/Individual	Date	Page # of Response
CR	Letter from CalRecycle/California Department of Resources Recycling and Recovery (Benjamin Escotto, Environmental Scientist, Permitting & Assistance Branch – South Unit Waste Permitting, Compliance & Mitigation Division) 1001 I Street Sacramento, CA 95814	August 6, 2019	RTC-3
AF	Letter from April Fitzpatrick, Manager 1512 Calzona Street, LLC Email from April Fitzpatrick, Manager 1512 Calzona Street, LLC	August 20, 2019	RTC-9
BC	Letter from Blum Collins LLP, Hannah Bentley Of Counsel 707 Wilshire Boulevard, Suite 4880 Los Angeles, CA 90017	August 27, 2019	RTC-21
C	Letter from Public Utilities Commission Chi Cheung To, Senior Utilities Engineer Specialist, Rail Crossings and Engineering Branch, Rail Safety Division 320 West 4 th Street, Suite 500 Los Angeles, CA 90013	August 29, 2019	RTC-36
CT	Letter from California Department of Transportation District 7 – Office of Regional Planning 100 S. Main Street, Suite 100 Los Angeles, CA 90012 (Miya Edmonson, IGR/CEQA Branch Chief)	August 29, 2019	RTC-40

California Environmental Protection Agency

Gavin Newsom
California Governor



Department of
Resources Recycling and Recovery

Jared Blumenfeld
Secretary for
Environmental Protection
Scott Smithline
CalRecycle Director

August 6, 2019

Jose Gutierrez, Environmental Supervisor 2
City of Los Angeles, Local Enforcement Agency
Los Angeles Department of Building and Safety
Environmental Affairs Division
221 N. Figueroa Street, Room 1250
Los Angeles, CA 90012

Subject: SCH No. 2019079096 –Draft Initial Study/Mitigated Negative Declaration for Direct Disposal, SWIS No. 19-AR-1228 – City of Los Angeles

Dear Mr. Gutierrez:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The City of Los Angeles Local Enforcement Agency, Los Angeles Department of Building and Safety, Environmental Affairs Division, acting as Lead Agency, has prepared and circulated a Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The name of proposed project is Draft Initial Study/Mitigated Negative Declaration-Direct Disposal Large Volume Solid Waste Transfer/Processing Facility. The proposed project is located at 3720 Noakes Street, Los Angeles, CA 90023. The proposed project is situated east of Calzona Street, west of Los Palos Street and south of Union Pacific Avenue. The project site is approximately 1.2 acres and is currently zoned for heavy industrial. All immediately adjacent properties are also zoned for heavy industrial. A mill, a garment manufacturing facility, and a warehouse occupy the north side of the proposed project. A printing facility occupies property to the east, a wholesale distribution warehouse occupies property to the west, and a vacant strip of land owned by Union Pacific Railway is located to the south.

Direct Disposal is currently a Medium Volume Construction and Demolition/Inert Debris Processing Facility that operates 24 hours per day, seven days per week and can process and transfer up to 175 tons per day (TPD). The site consists of a building that houses processing equipment (screens and a sort line), a repair shop, truck scales, a scale house and outdoor storage areas. The site is fully

1001 I Street, Sacramento, CA 95814 • P.O. Box 4025, Sacramento, CA 95812
www.CalRecycle.ca.gov • (916) 322-4027

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enclosed by an 8-foot tall perimeter fence. Off-site parking is provided at 3719 Noakes Street (storage of roll-off containers also occurs here).

The proposed project would allow for Direct Disposal to increase the processing and transferring of solid waste material to 500 TPD. The facility would still operate 24 hours per day, seven days per week. Proposed improvements to increase operational efficiency include: opening new access doors on the east and west side of the building to improve vehicle circulation, material processing and material transfer, adding a low speed shredder, adding screens, increasing bunker capacities and extending the sort line. Future improvements may include a vehicle queuing lane, a truck scale, a scale-house and offices at 3719 Noakes Street.

COMMENTS

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft IS/MND, in addition to the specific location noted.

Comments for the Draft IS/MND and Mitigation Monitoring and Reporting Program (MMRP) are summarized in the table below:

Document	Page and Location	Comment	
Initial Study	P.13 – Environmental Factors Potentially Affected	The factors that require at least one mitigation measure should be checked. Recommend to rephrase "...one impact that is a "Potentially Significant Impact" as indicated by the checklist..." to "...one impact that is "Potentially Significant Unless Mitigation is Incorporated" as indicated by the checklist..."	CR1
Initial Study	P.19, 21, 34 and 38 – Air Quality (3.3 b), Air Quality (3.3 e), Public Services (3.13 a), and Utilities and Service Systems (3.16 g)	Each of these sections has mitigation measures cited. "Potentially Significant Unless Mitigation Incorporated" should be checked for each of these sections.	CR2
MND	P.3 – Proposed Project (Section 1.6)	Recommend to clarify the description of the facility from "...Medium Volume Direct Disposal Construction, Demolition and Inert (CDI) Material Recovery Facility (MRF)..." to "...Medium Volume Construction and Demolition/Inert Debris (CDI) Processing Facility named Direct Disposal, a type of Material Recovery Facility (MRF)..."	CR3

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Document	Page and Location	Comment	
MND	P.3 – Proposed Project (Section 1.6)	This section states that “The proposed Large Volume SWFP will allow up to 500 TPD of solid waste to be processed and transferred at the Direct Disposal facility.” Section 3.3 (e) of the Initial Study states that the facility (in addition to CDI) will be receiving municipal solid waste (MSW), greenwaste and organic waste. Recommend to specify in the Proposed Project section the different streams of material the facility will be receiving. Figure 3-Site Plan should also show where each stream of material will be stored.	CR4
MND	P.3 – Proposed Project (Section 1.6)	The term “COD” is used to describe incoming material. What does “COD” stand for?	CR5
MND	P.5 – Site Plan (Figure 3)	Section 1.6 states that there is a repair shop. Could not locate the repair shop on the Site Plan.	CR6
MND	P.6 – Proposed Project (Section 1.6)	Title 14, Section 18221 of the California Code of Regulations (CCR) is referenced in regards to a Transfer/Processing Report (TPR). The correct regulation is Title 14, Section 18221.6.	CR7
MND	P.7 – City-Wide Community Plan Map (Figure 4)	The image on this page is blurry. Can a clearer image be used?	CR8
MND	P.9 – General Plan and Zoning (Section 1.7)	There are two bullet points in this section. The second bullet point describes the location of the facility, not the contents of the referenced Los Angeles Municipal Code. Thus the second bullet point should not be a bullet point, but simply its own paragraph.	CR9
MMRP	P.14 – Table A-2	Mitigation measure HHM6 is missing.	CR10

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Document	Page and Location	Comment
MMRP	P.16 – Table A-2	The description of mitigation measure N-1 states, "The project shall comply with the City of Los Angeles Noise Ordinance..." This should be restated as "The project shall comply with the City of Los Angeles Noise Ordinance..."

CR11

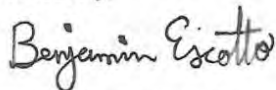
CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the MND and in carrying out their responsibilities in the CEQA process. CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

If the environmental document is to be adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is to be adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision making body.

If you have any questions regarding these comments, please contact me at 916.341.6138 or by e-mail at benjamin.escotto@calrecycle.ca.gov.

Sincerely,



Benjamin Escotto, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Jeff Hackett - CalRecycle
jeff.hackett@calrecycle.ca.gov

David Thompson – LEA
david.thompson@lacity.org

Governor's Office of Planning & Research

AUG 06 2019

STATE CLEARINGHOUSE

Comment CR 1 – On page 13 of the Draft IS/MND, regarding “Environmental Factors Potentially Affected”, the factors that require at least one mitigation measure should be checked. Recommend to rephrase " ... one impact that is a "Potentially Significant Impact" as indicated by the checklist... " to " ... one impact that is "Potentially Significant Unless Mitigation is Incorporated" as indicated by the checklist...”

Response CR 1–The Clarifications and Modifications Section, (page CM-7), revises “Environmental Factors Potentially Affected” to address comment CR1, and those potential environmental effects requiring mitigation measures have been checked. as mitigation measures were included in the Draft IS/MND. This correction will not result in any new impacts or mitigation measures or increase the severity of any impact.

Comment CR 2 – On pages 19, 21, 34 and 38- of the Draft IS/MND, regarding Air Quality (3.3 b), Air Quality (3.3 e), Public Services (3.13 a), and Utilities and Service Systems (3.16 g), each of these sections has mitigation measures cited. "Potentially Significant Unless Mitigation Incorporated" should be checked for each of these sections.

Response CR 2 – The Clarifications and Modifications section revises the Draft IS/MND checklist to reflect that the impacts for Air Quality (3.3 b and 3.3 e), Public Services (3.13 a), and Utilities and Service Systems (3.16 g) are revised to "Potentially Significant Unless Mitigation Incorporated". See Section 1, Comments and Modifications, pages CM-8 and CM-10. These corrections will not result in any new impacts or mitigation measures or increase the severity of any impact.

Comment CR 3 – On page 3- of the Draft IS/MND, regarding the Proposed Project (Section 1.6), recommend to clarify the description of the facility from " ... Medium Volume Direct Disposal Construction, Demolition and Inert (CDI) Material Recovery Facility (MRF) ..." to " ... Medium Volume Construction and Demolition/Inert Debris (CDI) Processing Facility named Direct Disposal, a type of Material Recovery Facility (MRF) ...”.

Response CR 3 – The Clarifications and Modifications Section 1, page CM-1, revises the first sentence of the first paragraph of the Draft IS/MND to read: “The proposed project entails an application for a Large Volume Solid Waste Facility Permit (SWFP) to allow expansion of the existing 175 ton per day (TPD) Direct Disposal Medium Volume Construction, Demolition and Inert (CDI) Material Recovery Facility (MRF) (reference CalRecycle SWFP no. 19-AR-1228), located at 3720 Noakes Street in the City of Los Angeles. This revision to the project description will not result in any new impacts or mitigation measures or increase the severity of any impact.

Comment CR 4 – On page 3- of the Draft IS/MND, regarding the Proposed Project (Section 1.6), this section states that "The proposed Large Volume SWFP will allow up to 500 TPD of solid waste to be processed and transferred at the Direct Disposal facility." Section 3.3 (e) of the Initial Study states that the facility (in addition to CDI) will be receiving municipal solid waste (MSW), greenwaste and organic waste. Recommend to specify in the Proposed Project section the different streams of material the facility will be receiving. Figure 3-Site Plan should also show where each stream of material will be stored.

Response CR 4 – Source separated organics and greenwaste will not be accepted at the facility. If MSW is being tipped and transferred at the facility it will be temporarily stored in Bunker B1 as shown in **Figure 3** (see Comments and Modifications Section page CM-3). The Clarifications and Modifications Section eliminates references to greenwaste and organic material in Section 3.3 (Air Quality), Subsection “e”, (see Comments and Modifications Section page CM-10) and from the mitigation monitoring and reporting program Appendix A, mitigation measures AQ 10 and AQ11 (See Comments and Modifications Section page CM-11). This revision to the project description will not result in any new impacts or mitigation measures or increase the severity of any impact.

Comment CR 5 – On page 3- of the Draft IS/MND, regarding the Proposed Project (Section 1.6), the term "COD" is used to describe incoming material. What does "COD" stand for?

Response CR 5 –Section 1, Clarifications and Modifications, page CM-1 corrects the typo “COD” to “C&D”.

Comment CR 6 – On page 5 of the Draft IS/MND, regarding Figure 3 “Site Plan”, Section 1.6, states that there is a repair shop. Could not locate the repair shop on the Site Plan.

Response CR 6 – There repair shop, which is an open area, is shown on the revised **Figure 3** in Section 1, Clarifications and Modifications, on page CM-4 (next to HHW locker).

Comment CR 7 – On page 6 of the Draft IS/MND, regarding the proposed project (Section 1.6), Title 14, Section 18221 of the California Code of Regulations (CCR) is referenced in regards to a Transfer/Processing Report (TPR). The correct regulation is Title 14, Section 18221.6.

Response CR 7 – Comment noted. The Clarifications and Modifications Section includes a reference to the correct regulation Title 14, Section 18221.6. See page Clarifications and Modifications Section, page CM-4.

Comment CR 8 – On page 7 of the Draft IS/MND, regarding Figure 4 “City-Wide Community Plan Map”, the image on this page is blurry. Can a clearer image be used?

Response CR 8 – Comment noted. A better copy of the City-Wide Community Plan Map has been included in the in the Clarifications and Modifications Section, on page CM-5.

Comment CR 9 – On page 9 of the Draft IS/MND, regarding Section 1.7 “General Plan and Zoning”, there are two bullet points in this section. The second bullet point describes the location of the facility, not the contents of the referenced Los Angeles Municipal Code. Thus, the second bullet point should not be a bullet point, but simply its own paragraph.

Response CR 9 – Comment noted. The second bullet point has been revised to a separate paragraph in the Clarifications and Modifications Section, page CM-7.

Comment CR 10 – On page 14 of Table A-2 of Appendix A of the Draft IS/MND, mitigation measure HHM6 is missing.

Response CR 10 – Comment noted. Appendix A, Table A-2 “Implementation of Mitigation Measures” of the Draft IS/MND has been revised to include mitigation measure HHM6. See Comments and Modifications Section, page CM-12.

Comment CR 11 – On page 16 of Table A-2 of Appendix A of the Draft IS/MND, the description of mitigation measure N-1 states, "The project shall company with the City of Los Angeles Noise Ordinance ... 11 This should restated as "The project shall comply with the City of Los Angeles Noise Ordinance ... II

Response CR 11 – Comment noted. Appendix A, Table A-2 “Implementation of Mitigation Measures – N1” of the Draft IS/MND has been revised to correct the word “company” to “comply” See Comments and Modifications Section, page CM-13.

August 20, 2019

City of Los Angeles Department of Building and Safety Local Enforcement Agency
Department of Building and Safety
201 North Figueroa Street
Los Angeles, CA 90012

Re: Mitigation Measures / Comments – Direct Disposal
3720 Noakes Street, Los Angeles, CA

Attention: Jose Gutierrez, LEA Program Supervisor

The information received in your Notice of Availability and Intent to Adopt a Mitigated Negative Declaration Letter for the Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project received in July, 2019, is clearly flawed with many issues not properly identified or addressed. The proposed expansion project will have significant environmental health and safety impacts to the properties and businesses in the surrounding areas.

AF-1

The proposed project increase of solid waste processing from 175 tons per day to 500 tons per day will cause significant environmental health and safety issues. The traffic impacts, street and road damage, dust, dirt, particulates, trash debris, air quality, health issues, vehicle damage, and noise are many of the challenges the surrounding businesses are already faced with. If expansion is allowed, these issues, along with many more, will increase exponentially. Volume speaks numbers even though there is no new floor area included as part of the proposed project.

AF-2

Currently, Calzona Street, is used as a thoroughway to reach the facility. This limits access and hinders all businesses operations. Customers and employees, both in vehicles and on foot, are delayed in going in and out of the business establishments on that street. Trucks are lined up at the stop sign, blocking loading docks, driveways, and parking spots as a result of the congestion as it exists today. With the proposed increase in tonnage, the additional amount of vehicle traffic traveling down this street will further hinder existing businesses and their functionality. The trucks driving to and from the Facility follow no set traffic control, safety and enforcement plan which causes an overabundance of unnecessary issues to all parties affected by this type of disposal business.

AF-3

Often times, many of the trucks that visit the site travel at a high rate of speed. This causes safety issues especially since there is no enforcement in the area currently to address this matter and it can only get worse if there is an increase in daily tonnage. Trash vehicles are not currently covering their loads properly which causes debris (large and small) to spew over onto the street creating with a large amount eventually blowing into the businesses. There is no control over the way the trash is loaded on the trucks currently at the existing 175 tons per day. The magnitude of 500 tons per day will create significant additional street trash. The types of materials that have been a chronic issue are metal pieces, nails, and wood which ultimately cause damage to company and employee vehicles and tires. The streets in the surrounding area continue to be filthy due to the facility being in close proximity. The trash, dirt, debris, and air particles generated as a result of the disposal trucks traveling in the area is not addressed.

AF-4

Additionally, the materials actually processed at the facility also cause many issues as the trash is moved through the sorting line. The screens and fences do not provide full capture which affects the surrounding community's quality of life. Dirt, dust and debris can be seen floating in the air which ultimately settles on the local businesses. On a daily basis, the internal and external portions of the surrounding buildings are covered with a layer of dirt, dust and debris. The furniture, equipment, and floors are also covered with dirt and dust. Management of this particular location is forced to hire additional staff to clean the affected areas. Management has also been forced to address the tenants and their respective employees who have filed formal health complaints and have exercised the use of sick days as a result. Several employees now wear masks when conducting routine business functions.

AF-5

The Air Quality Management District was contacted in an effort to address some of the aforementioned issues via complaint #277016 which was filed on June 1, 2017. The inspector at the time and the Direct Disposal owner tried to lessen the issues by installing additional fencing, however, many of the issues continue.

Therefore, in summary, the Facility located at 3720 Noakes Street should not be approved for expansion unless the following mitigation measures are permanently implemented:

AF-6

1. Daily street sweeping/cleaning - removal of all street trash, nails, dirt, dust, debris as a result of the truck traffic in the area
2. Fully enclose the Disposal Facility - this is the only way trash, dirt, dust, debris, and particulates can be eliminated from traveling to the surrounding businesses and to keep the noise levels down
3. Traffic enforcement measures - disposal trucks properly covered, enforce traffic laws which includes speeding
4. Traffic control measures - divert traffic to major arterials, delineation, signage, installation of humps/bumps, enforce safety measures and vehicle requirements
5. Limit hours of operation at the facility - to limit the duration of traffic congestion issues in the surrounding areas.

AF-6
(cont.)

Based on the existing matters identified in this letter, an even larger issue and overarching concern is the continued decline in property values as a result of this Facility. This type of Facility (material recovery and transfer station facility) reduces property values in the area. The affected properties value will further plummet should the proposed expansion be approved. Additionally, there will a decline in in leasing commercial at the current rate and vacancies with increase unless the City of Los Angeles places these mitigation measures.

AF-7

Your consideration of these matters would be greatly appreciated.

1512 Calzona Street, LLC
1540 Calzona Street
Los Angeles, CA 90023
April Fitzpatrick, Manager

From: **April Fitzpatrick** <aprilfitz@earthlink.net>
Date: Wed, Aug 28, 2019 at 11:01 AM
Subject: Mitigation Measures / Comments - 3720 Noakes Street, LA, CA - Continued!
To: Jose Gutierrez <jose.gutierrez@lacity.org>
Cc: Eli Antaky Jr. - Dad <antaky@antakyquilting.com>, Derek Antaky
<derek@antakyquilting.com>, Mike from Magnum Properties
<mikem@magnumprops.com>

Hi Jose,

As an addendum to my previously sent letter addressing our concerns, please include these additional requests which includes supporting documentation. All of this information is related to Direct Disposal's affects to the surrounding businesses in the area.

AF-8

These photos depict an unpaved area in the street right-of-way that causes a dust/dirt problem when trucks stage/idle/park on Calzona street in front of our building waiting to weigh/dump their loads. We do not want construction and demo trucks lining up on Calzona, however, when they do, it presents unnecessary issues. The unpaved areas follow the length of the street and there is a larger piece at the corner of Calzona & Noakes street. Can you please include the requirement that the City of Los Angeles Public Works Department paves this area?

AF-9

As you can see, there are countless truck tire marks because they use this as a queuing up area throughout the day to reach Direct Disposal's scale before dumping. Here is an example below of a truck with a full load with one side of the truck's tires in the unpaved area sitting idle kicking up dust/dirt.

AF-10

Please see below, In walking the area daily for metals, nails, debris, this is what we found within 5 minutes. Many of these items with extremely sharp edges/points. Flat tires continue to be an ongoing problem with workers as a result.

AF-11

Lastly, the old rail lines continue to exist going across Noakes Street in front of Direct Disposal. The metal channels jolt all trucks passing over throughout the day which also creates unnecessary dust and dirt. Please also include paving in this area as a requirement so that the City of Los Angeles Public Works department can perform the work. It appears the City has already paved other areas where the rail is no longer use, just not there specifically.

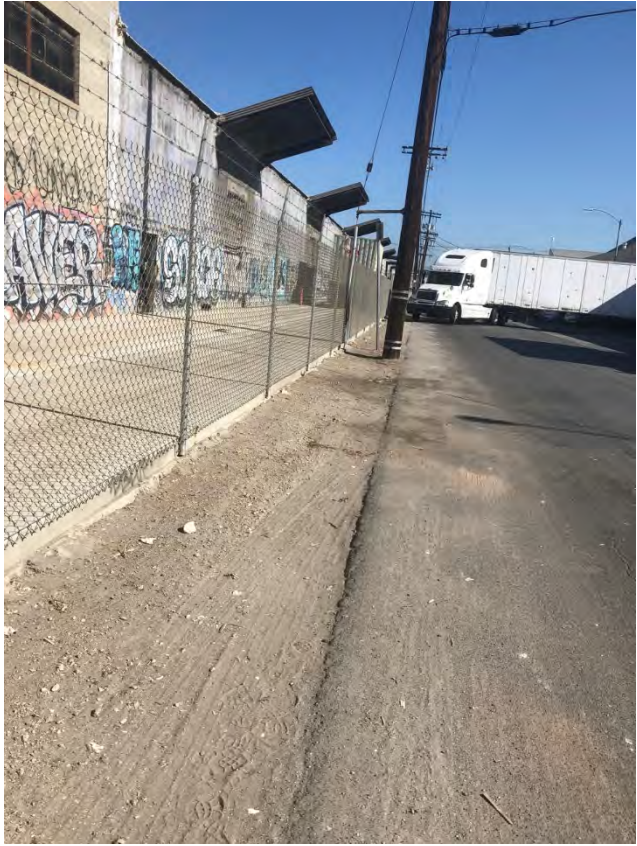
AF-12

Your consideration is greatly appreciated.

Photos referenced in comment AF-9.



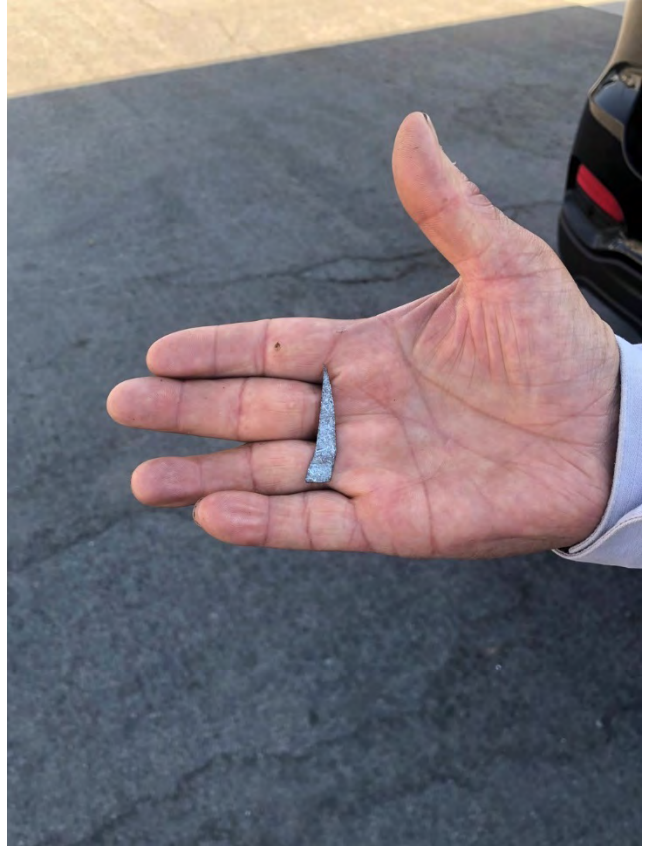
Photos Referenced in comment AF-10



As you can see, there are countless truck tire marks because they use this as a queuing up area throughout the day to reach Direct Disposal's scale before dumping. Here is an example below of a truck with a full load with one side of the truck's tires in the unpaved area sitting idle kicking up dust/dirt.



Please see below, in walking the area daily for metals, nails, debris, this is what we found within 5 minutes. Many of these items with extremely sharp edges/points. Flat tires continue to be an ongoing problem with workers as a result.



April Fitzpatrick (AF) Comments and Responses

Comment AF 1 – The information received in your Notice of Availability and Intent to Adopt a Mitigated Negative Declaration Letter for the Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project received in July, 2019, is clearly flawed with many issues not properly identified or addressed. The proposed expansion project will have significant environmental health and safety impacts to the properties and businesses in the surrounding areas.

Response AF 1 – The draft IS/MND did not find any potential for the project to adversely impact environmental health and safety with adoption of proposed mitigation measures. Potential environmental health and safety impacts related to air quality, hazards and hazardous materials, and hydrology and water quality resulting from the proposed project were analyzed in the Draft IS/MND. With adoption of the proposed mitigation measures the proposed project will not result in significant environmental impacts.

Comment AF 2 – The proposed project increase of solid waste processing from 175 tons per day to 500 tons per day will cause significant environmental health and safety issues. The traffic impacts, street and road damage, dust, dirt, particulates, trash debris, air quality, health issues, vehicle damage, and noise are many of the challenges the surrounding businesses are already faced with. If expansion is allowed, these issues, along with many more, will increase exponentially. Volume speaks numbers even though there is no new floor area included as part of the proposed project.

Response AF 2 – See Response AF-1 for a discussion of project impacts related to environmental health and safety issues. The Draft IS/MND found that the proposed project did not create any public health and Safety impacts with implementation of the proposed mitigation measures.

While heavy trucks such as those using the Direct Disposal facility can result in additional wear and tear on local roadways, the project site is located in a “heavy industrial” zoned area with numerous nearby warehouses and industrial uses that generate large numbers of heavy truck trips over the local street system. The City of Los Angeles Bureau of Street Services/Streets LA is responsible for maintaining the local street system, and according to the Streets LA website, Noakes Street is classified as being in “poor condition”. Any issues with the condition of the street should be directed to the City of Los Angeles Bureau of Street Services.

In response to the commentator’s point regarding air quality and health issues, an air quality analysis has been prepared and included in the Final IS/MND based on the California Emission Estimator Model (CalEEMod) version 2016.3.2 and use of the AQMD’s “Off-Road – Model Mobile Source Emission Factors”. Detailed worksheets have been included in **Appendix CM-I** of the Final IS/MND. Based on the air quality analysis, the project will not exceed any of the South Coast Air Quality Management District’s air quality standards and will not result in a significant air quality impact.

The use of traffic spotters by Direct Disposal is intended to increase safety and reduce the impacts of vehicles traveling to and from the project site on the local street system and local businesses.

Comment AF 3 – Currently, Calzona Street, is used as a throughway to reach the facility. This limits access and hinders all businesses operations. Customers and employees, both in vehicles

and on foot, are delayed in going in and out of the business establishments on that street. Trucks are lined up at the stop sign, blocking loading docks, driveways, and parking spots as a result of the congestion as it exists today. With the proposed increase in tonnage, the additional amount of vehicle traffic traveling down this street will further hinder existing businesses and their functionality. The trucks driving to and from the Facility follow no set traffic control, safety and enforcement plan which causes an overabundance of unnecessary issues to all parties affected by this type of disposal business.

Response AF 3 –In addition to using Calzona Street, vehicles can access the site using Esperanza, Mirasol and Calada Streets. The use of traffic spotters by Direct Disposal is intended to reduce the impacts of vehicles traveling to and from the project site on the local street system and local businesses, and to prevent traffic associated with vehicles using the facility from impacting through traffic as well as other businesses in the area. Customers and company drivers are instructed to obey speed limits and be courteous of local business.

Comment AF 4 – Often times, many of the trucks that visit the site travel at a high rate of speed. This causes safety issues especially since there is no enforcement in the area currently to address this matter and it can only get worse if there is an increase in daily tonnage. Trash vehicles are not currently covering their loads properly which causes debris (large and small) to spew over onto the street creating with a large amount eventually blowing into the businesses. There is no control over the way the trash is loaded on the trucks currently at the existing 175 tons per day. The magnitude of 500 tons per day will create significant additional street trash. The types of materials that have been a chronic issue are metal pieces, nails, and wood which ultimately cause damage to company and employee vehicles and tires. The streets in the surrounding area continue to be filthy due to the facility being in close proximity. The trash, dirt, debris, and air particles generated as a result of the disposal trucks traveling in the area is not addressed.

Response AF 4 –The operator will work to inform all drivers of the need to observe posted speed limits on- and off-site.

In response to the commentator's point regarding customers not covering their loads, it is the operator's policy to not allow use of the facility unless the incoming load is tarped. In addition, all outbound material loads are prohibited from leaving the site unless they are tarped. Direct Disposal has a litter control plan and designated employees assigned to sweeping and picking up litter in the area. The commentator's concerns are noted, and additional efforts will be made to address those concerns.

Comment AF 5 – Additionally, the materials actually processed at the facility also cause many issues as the trash is moved through the sorting line. The screens and fences do not provide full capture which affects the surrounding community's quality of life. Dirt, dust and debris can be seen floating in the air which ultimately settles on the local businesses. On a daily basis, the internal and external portions of the surrounding buildings are covered with a layer of dirt, dust and debris. The furniture, equipment, and floors are also covered with dirt and dust. Management of this particular location is forced to hire additional staff to clean the affected areas. Management has also been forced to address the tenants and their respective employees who have filed formal health complaints and have exercised the use of sick days as a result. Several employees now wear masks when conducting routine business functions.

The Air Quality Management District was contacted in an effort to address some of the aforementioned issues via complaint #277016 which was filed on June 1, 2017. The inspector at the time and the Direct Disposal owner tried to lessen the issues by installing additional fencing, however, many of the issues continue.

Response AF 5 – Dust is generated by operations at the facility, and the use of a misting system, debris fencing and watering dusty loads when they are tipped all reduce potential impacts to less than significant levels. Installation of a misting system that covers all dust generating activities has been included as a mitigation measure and will be required as a condition of the Solid Waste Facility Permit.

Dust complaints are enforced by the South Coast Air Quality Management District (SCAQMD), and the facility is inspected on a regular basis. Direct Disposal not been cited by the SCAQMD for creating excessive dust.

Comment AF 6 – Therefore, in summary, the Facility located at 3720 Noakes Street should not be approved for expansion unless the following mitigation measures are permanently implemented:

1. Daily street sweeping/cleaning - removal of all street trash, nails, dirt, dust, debris as a result of the truck traffic in the area
2. Fully enclose the Disposal Facility - this is the only way trash, dirt, dust, debris, and particulates can be eliminated from traveling to the surrounding businesses and to keep the noise levels down
3. Traffic enforcement measures - disposal trucks properly covered, enforce traffic laws which includes speeding
4. Traffic control measures - divert traffic to major arterials, delineation, signage, installation of humps/bumps, enforce safety measures and vehicle requirements
5. Limit hours of operation at the facility - to limit the duration of traffic congestion issues in the surrounding areas.

Response AF 6 – The following responses are provided in regard to the commentator's recommended mitigation measures:

1. The facility operator will continue to conduct daily street sweeping/cleaning - removal of all street trash, nails, dirt, dust, and debris generated as a result of the truck traffic in the area associated with the Direct Disposal facility
2. Material tipping, and a portion of the sorting and processing operations, are conducted inside the existing building. Open operations are permitted under the current use of land permit. Construction of better debris fencing and installation of misting systems over dust generating activities will reduce the potential impacts associated with processing MSW and CDI material such as dirt, dust, debris, odors, and particulates on surrounding businesses.

3. The facility operator will work with employees and customers to comply with on and off-site vehicle speed limits and tarping requirements.
4. The facility operator will work with employees, customers, and local businesses to address traffic routing and control issues, and use spotters, as well as signage, to enforce safety measures and vehicle tarping requirements. The installation of street signage or street humps/bumps is under the jurisdiction of the City and the applicant does not have the authority to make such improvements.
5. The facility is currently permitted to operate 24 hours per day, seven days per week. Vehicles using the facility are primarily associated with the construction industry and tend to arrive during off-peak hours since they start work early in the morning and end work in the early afternoon (off-peak hours). In addition, the applicant can dispatch company vehicles, and call for material transfer vehicles, during off-peak hours in order to reduce the time drivers sit in traffic. Limiting the hours of operation could result in increased traffic impacts by increasing the number of vehicles using the facility during peak traffic hours.

Regarding noise levels, the facility is required to comply with the City of Los Angeles regulations contained in Section 111.03, which is enforceable by the City Department of Building and Safety. No noise violations have been issued for the current operations.

Comment AF 7 – Based on the existing matters identified in this letter, an even larger issue and overarching concern is the continued decline in property values as a result of this Facility. This type of Facility (material recovery and transfer station facility) reduces property values in the area. The affected properties value will further plummet should the proposed expansion be approved. Additionally, there will a decline in in leasing commercial at the current rate and vacancies with increase unless the City of Los Angeles places these mitigation measures.

Response AF 7 – Comment noted. The reduction in property values associated with a recycling and transfer station is an opinion of the commentator and not supported by any empirical data.

Comment AF 8 – As an addendum to my previously sent letter addressing our concerns, please include these additional requests which includes supporting documentation. All of this information is related to Direct Disposal's affects to the surrounding businesses in the area.

Response AF 8 – Comment noted.

Comment AF 9 – These photos depict an unpaved area in the street right-of-way that causes a dust/dirt problem when trucks stage/idle/park on Calzona street in front of our building waiting to weigh/dump their loads. We do not want construction and demo trucks lining up on Calzona, however, when they do, it presents unnecessary issues. The unpaved areas follow the length of the street and there is a larger piece at the corner of Calzona & Noakes street. Can you please include the requirement that the City of Los Angeles Public Works Department paves this area?

Response AF 9 – In response to the commentator's point regarding unpaved portions of the street causing dust/dirt problems, the project does not require street dedications or improvements since no new construction is being proposed. If street dedications and improvements were being required, they would only be constructed adjacent to the subject property which would not full

address the problem. Street sweeping and litter patrols are proposed as part of the project to reduce the potential for dust and dirt being generated from vehicles traveling along unpaved portions of the local street system.

Comment AF 10 – As you can see [from the photos], there are countless truck tire marks because they use this as a queuing up area throughout the day to reach Direct Disposal's scale before dumping. Here is an example below of a truck with a full load with one side of the truck's tires in the unpaved area sitting idle kicking up dust/dirt.

Response AF 10 – Comment noted. Direct Disposal's trucks and the trucks of customers, as well as trucks from the other businesses in the area use the dirt shoulder for parking, staging, and turning. The shoulder shown in the photos above is adjacent to a property not owned by Direct Disposal. Any future street improvements would be the responsibility of the adjacent property owner and would not be required until the property is redeveloped. Direct Disposal is committed to minimizing track-out from the site, employing the use of a street sweeper and providing regular litter patrols.

Comment AF 11 – Please see photos below. In walking the area daily for metals, nails, debris, this is what we found within 5 minutes. Many of these items with extremely sharp edges/points. Flat tires continue to be an ongoing problem with workers as a result.

Response AF 11 – Comment noted. As noted previously, Direct Disposal is committed to minimizing track-out from the site, employing the use of a street sweeper and providing regular litter patrols. Employees are directed to be on the lookout for objects such as those pictured and litter in general and properly dispose of such materials when found. All inbound loads are tarped so the debris pictured did not likely come from vehicles using the facility. The commenters assertion the objects pictured are from Direct Disposal can not be verified.

Comment AF 12 – Lastly, the old rail lines continue to exist going across Noakes Street in front of Direct Disposal. The metal channels jolt all trucks passing over throughout the day which also creates unnecessary dust and dirt. Please also include paving in this area as a requirement so that the City of Los Angeles Public Works department can perform the work. It appears the City has already paved other areas where the rail is no longer use, just not there specifically.

Response AF 12 –The City Department of Public Works and Bureau of Street Services are responsible for all work in the public right-of-way, and rail lines fall under the jurisdiction of the California Public Utilities Commission. The abandonment of any rail lines/spurs would need to be initiated by the rail company or property owner served by the rail line or spur and approved by the railroad company that owns the infrastructure. Any street patching would need to be approved and inspected by the City Department of Public Works.

BLUM | COLLINS LLP

Aon Center
707 Wilshire Boulevard
Suite 4880
Los Angeles, California
90017

213.572.0400 phone
213.572.0401 fax

August 27, 2019

Jose Gutierrez Local Enforcement Agency 221 N. Figueroa Street, Room 1250 Los Angeles, CA 90012 jose.gutierrez@lacity.org	<i>Via Email (with Attachments) and U.S. Mail (without Attachments)</i>
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Re: *Direct Disposal Large Volume Solid Waste Transfer/Processing Facility
Project, Mitigated Negative Declaration*

Dear Mr. Gutierrez:

This letter and the Attachments provided herewith constitute our comments under the California Environmental Quality Act ("CEQA") on behalf of the Golden State Environmental Justice Alliance on all approvals related to the above-cited project ("the Project") and its Mitigated Negative Declaration ("MND"), a Notice of Availability for which went out on July 29, 2019. The proposed Project anticipates changing the permits for the sites at 3720 and 3719 Noakes Street in the City of Los Angeles to allow applicant Direct Disposal to operate a Large Volume Solid Waste Facility accepting up to 500 tons per day ("tpd") of both construction, demolition and inert ("CDI") material including up to 100 tpd of municipal solid waste ("MSW"). At present, Direct Disposal operates a medium volume (up to 175 tpd) material processing facility at these addresses for CDI only. See MND at 3 (PDF at 6), Transfer/Processing Report ("TPR") (attached to MND) at 1 (PDF at 74). The Project apparently requires a Solid Waste Facility Permit ("SWFP") pursuant to various provisions of Title 27 of the California Code of Regulations; it appears to us (based on our comments immediately below) that it also requires a Conditional Use Permit ("CUP") according to the City of Los Angeles Municipal Code. There may be other permits required, and the MND is flawed in not identifying these anywhere in the document.

BC1

BC2

Project Site Description

The Notice of Availability and the MND describe the Project site as 3720 Noakes Street, Los Angeles, CA, but this is not fully accurate, as the Project clearly anticipates the use of the site across the street at 3719 Noakes Street as a "staging area," see, e.g., TPR, attached to MND, at 6 (Figure 4) (PDF at 79), for vehicle queuing, container storage and

BC3

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parking (functions it is currently performing at the lower 175 tpd authorization currently held).¹ Indeed, the MND states that:

BC3

Future improvements may also include a vehicle queuing lane, a truck scale, scale-house and offices at the 3719 Noakes Street property which will free up additional space at 3720 Nokes [sic] Street from [sic] material storage and processing.

MND at 3 (PDF at 6). These latter functions are not apparently evaluated in the MND at all and therefore Direct Disposal's pursuance of them (with the Local Enforcement Agency's apparent tacit approval) would violate CEQA, if not other laws. But the larger point is that an environmental impact report ("EIR") should have been prepared because if the site description had properly included 3719 Noakes Street, as the TPR does, *see* TPR at 1 (PDF at 74),² there would be *more* than a fair argument that a significant impact on the environment could occur, because the Project involves more than 100 trucks per day visiting these two sites within 1,000 feet of residences, and that is the threshold for further review (and for required changes in a project) as set forth in the California Air Resources Board's ("ARB's") *Air Quality and Land Use Handbook* (2005) (a copy of which is provided as Attachment A hereto). *See* ARB, *Air Quality and Land Use Handbook* at 15. *See also* TPR at 8 (PDF at 81) (Table 2, describing "Facility Traffic" as 224 "Vehicles Per Day," including 148 Inbound Vehicles, and 22 Outbound Vehicles, all of which would be trucks). It seems apparent to us that Direct Disposal, the Local Enforcement Agency, and their CEQA consultant, Clements Environmental, must have been aware of this basic fact and deliberately excluded 3719 Noakes Street from the 1,000 foot review included in the MND at 10 (MND Figure 6) (PDF at 13), and in the TPR at 4 (TPR Figure 4) (PDF at 77), for, as the MND acknowledges, there is residential development 1,010 feet from the "Project" if one excludes 3719 Noakes Street from the Project definition. *See* MND at 20 (Figure 7) (PDF at 23).

BC4

We'd like to know what notice regarding this Project has been provided to the residents on Los Palos Street, Prada Street, and La Puerta Street, and in what languages that notice was provided.

BC5

CUP Requirement

The second reason why the mislabeling of the Project as only involving 3720 Noakes Street is of concern is that the MND acknowledges that the Los Angeles Municipal Code ("LAMC") requires a CUP for a Recycling Materials Sorting Facility in an M3 Zone if the facility is less than 1,000 feet from an A, R, C, P, or PB zoned property. MND at 9 (PDF at 12), *citing* LAMC § 12.21A18(e). The "Facility," as reflected in the TPR (as

BC6

¹ *See also* TPR at 2 (PDF at 75), indicating that 3719 Noakes is used for "container storage, employee parking, and staging vehicles."

² The TPR states "This Transfer/Processing Report (TPR) has been prepared for, and at the request of, Direct Disposal *for their operations at 3720 and 3719 Noakes Street*, in the City of Los Angeles." (Emphasis supplied.)

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well as, apparently, the City's Certificates of Occupancy noted at TPR page 9 (PDF at 82)), includes 3719 Noakes Street, and therefore a CUP is required. Additionally, the facility is operating 24 hours per day and therefore requires a CUP because it is less than 1,000 feet from an R zone.

BC6

We also note that the MND's citation to LAMC section 12.21A18(e) appears to be inaccurate because that section covers "Recycling Materials Sorting Facilities," at which "no processing of Recyclable Materials" "shall be permitted." LAMC § 12.21A18(e)(3); the present facility shreds and "processes" "Recyclable Materials" and therefore does not qualify. It would appear that the facility would be addressed by LAMC section 12.21A18(f), for "Recycling Materials Processing Facilities," but that it still would not qualify without obtaining a CUP because under subdivision (f):

BC7

notwithstanding any other provisions of the Code, Recyclable Materials collected and processed on the site shall be limited to paper, cardboard, glass, metal, plastic and other items that are deemed appropriate by the Department of Building and Safety, Bureau of Sanitation, and Fire Department.

LAMC § 12.21A18(f)(3). The facility does not qualify because it now proposes to handle MSW. While LAMC section 12.03, Definitions, provides that Recyclable Materials may contain "yard waste," it does not provide for the handling of MSW. Additionally, while we do not have time to parse all the requirements of the LAMC right now, we have difficulty believing that a new transporter or handler of MSW would not be subject to a CUP or some other type of permit.

BC8

Additional Comments

MND at 7 (PDF at 10), Figure 4, includes a low-resolution image of a map of Los Angeles Area Community Plans. The resolution does not permit us to determine how the Project site is designated.

BC9

MND at 8 (PDF at 11) contains a Boyle Heights Community Plan map which is not much better. Again, we hope the residents in the close-by low density multifamily housing were served with notice by mail in their own first languages.

BC10

MND at 9 (PDF at 12) indicates that the facility has been a "medium volume solid waste transfer and processing facility" since 2008. However, page 3 of the MND (PDF at 6) indicates that the current permit is for a 175 tpd "Medium Volume Direct Disposal Construction, Demolition and Inert Material Recovery Facility (MRF)," which would appear to exclude permission to transfer MSW and organic wastes. This is a significant change. We believe the MND is materially misleading in this respect.

BC11

The TPR at 9 (PDF at 82) states under the bullet point "Environmental Documentation" that a Mitigated Negative Declaration and Notice of Determination "was [sic] adopted by

BC12

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the Local Enforcement Agency on June 7, 2019.” We have reviewed the City’s legal notices for MNDs going back to January 31, 2019, *see* https://planning.lacity.org/cir/publication/mnd_pub.htm, and have seen no reference to this Project. Additionally, a MND may only be approved, and a Notice of Determination adopted, *after* there has been public review of the MND, which has not been completed in the case of this MND at this point. *See* Pub. Res. Code § 21152(a) (providing for filing of notices of determination with the county clerk “within five working days *after the approval or determination becomes final*”) (emphasis supplied). The filing of a Notice of Determination would therefore be illegal under CEQA both under the terms of section 21152, *and* because it would discourage public comment on the Project by falsely suggesting to potential commenters that the Project was a *fait accompli*, which is opposite to CEQA’s purposes.

BC12

We went to the website where the Local Enforcement Agency (“LEA”) made the MND available, *see* <https://www.ladbs.org/services/core-services/code-enforcement/lea-information> and note that it nowhere gave members of the public notice as to when comments on the Project were due under CEQA, and simply provides a short description and a link to the MND. We had to go to the Office of Planning and Research’s ceqanet database in order to figure out what the deadline was. We think this lack of clarity is similarly contrary to CEQA’s purposes.

BC13

The TPR at 13 (PDF at 86) indicates that MSW will be transferred within 48 hours but that if it is not transferred within 24 hours, it will be containerized, which more than likely means it will be stored at 3719 Noakes Street, which again means that a CUP is required.

BC14

With regard to Air Quality impacts, the MND reaches the conclusion that the Project “will not increase any criteria pollutant,” and that, apparently, it will not expose sensitive receptors to substantial pollutant concentrations because “[t]he site is over 1,000 feet from residences and the nearest sensitive receptors.” MND at 19 (PDF at 22). We find the MND’s analysis inadequate on both points:

- First, with regard to criteria pollutants, we note, as mentioned before, that the TPR says the Project will lead to a total³ of 224 vehicles per day, of which 170 will be trucks. *See* TPR at 8 (PDF at 81) (Table 2, describing “Facility Traffic” as 224 “Vehicles Per Day,” including 148 “Inbound Vehicles,” and 22 “Outbound Vehicles,” described in footnote 1 as consisting of “Inbound Commercial Vehicles: 5 tons per load; Inbound Self-Haul Vehicles – 1 ton per load; [and] Outbound Trucks: 23 tons per load”). While some of the “Self-Haul Vehicles” may be small trucks, we anticipate they will all be trucks or else they will not be

BC15

³ At first blush, the TPR appears inconsistent with the MND, which states in its traffic section that the Project will lead to “an additional 274 daily vehicle trips (137 inbound and 137 outbound).” MND at 35 (PDF at 38). However, we presume that the traffic analysis addresses “additional” trips due to the Project, meaning that there are apparently approximately 87 vehicles per day visiting the site presently; if so, this means that the ratio of vehicles presently to vehicles predicted at 500 tpd would be about 39%, which is roughly proportionate to the increased tonnage attributable to the Project (175/500 = 35%). Additionally, 61% of the trips would be new trips (274/448 is approximately 0.61).

BC16

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capable of transporting a ton of waste each. Attachment B to this letter is an updated Air Quality Impact Analysis for the Knox Business Park project in Riverside County, California. The Knox Business Park project Air Quality Impact Analysis appears to have been based on a total of 113 trucks idling per day (Attachment B PDF at 544, 546, 548, and 550), and the Project was expected to lead to emissions of oxides of nitrogen or NO_x (which is a precursor to ozone or smog) in the amounts of 354.35 pounds per day in the summer and 369.16 pounds per day in the winter. See Attachment B, letter at 2 (PDF at 2).⁴ This was in comparison to the South Coast Air Quality Management District (“SCAQMD”) threshold of 55 pounds per day for operations, and thus yielded a significant impact, for which the applicant and the County of Riverside prepared an EIR. Based on this information, there is frankly no fair argument that the Project *does not* have a significant impact on the environment, and thus an EIR should have been prepared.

BC15
(cont.)

- Regarding exposure of sensitive receptors to Toxic Air Contaminants (“TACs”) such as Diesel Particulate Matter (“DPM”), since the Project involves more than 100 trucks per day, there would be an argument that the Project leads to a significant impact even if it *were not* less than 1,000 feet from the nearest sensitive receptors, but it *is*. Accordingly, more analysis of impacts was required, based on the advice of the ARB in the *Air Quality and Land Use Handbook*, as noted previously.

BC17

In sum, CEQA does not permit a lead agency to avoid evaluating an impact by simply not acknowledging that it may occur. An EIR was required.

Still concerning Air Quality, the MND concludes that there will not be any significant increase in odors at the site, even though the Project involves the new receipt of MSW and organic and green wastes. The LEA’s bare assurances do not eliminate a fair argument of a significant impact.

BC18

Regarding Hazards and Hazardous Materials, the MND acknowledges at 27 (PDF at 30) that incidental hazardous wastes will arrive on site. The MSW stream *will* include hazardous wastes and the discussion and proposed mitigation measures are inadequate.

BC19

Concerning stormwater from the site, the LEA acknowledges that it could initially violate water quality standards, but claims the impacts would be reduced to less than significant through compliance with Best Management Practices and the Industrial Storm Water General Permit. MND at 29 (PDF at 32). We are not so sanguine; litter cleaning will not prevent contact with stormwater, of the materials inside the bins, leaking containers, etc.

BC20

As to Land Use and Planning, the LEA asserts that the Project is developable “by right” such that there is no land use conflict. We disagree as noted above.

BC21

⁴ It is true that the Knox Business Park updated AQIA only addressed 113 trucks at Building D and the Project anticipated the development of a Building E as well; however, the AQIA still analyzed idling only at Building D and it still came up with a significant impact.

BC22

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Regarding utilities and being served by a landfill with sufficient capacity, the MND is misleading in stating that the increase in use will only be to 400 tpd. (MND at 38, PDF at 41).


BC23

We request that you advise us immediately when the responses to the comments on the MND are made available by mail and email at collins@blumcollins.com and bentley@blumcollins.com, and that we be placed on the list of parties to be notified of all actions relating to this Project under Public Resources Code section 21092.2. Please forward this request to the director of the LEA.

BC24

Thank you for your consideration.

Sincerely,


Hannah Bentley
Of Counsel
BLUM COLLINS, LLP

Attachments A, B: Included with emailed copy

Blum Collins (BC) Comments and Responses

Comment BC 1 – It appears to us (based on our comments immediately below) that it also requires a Conditional Use Permit ("CUP") according to the City of Los Angeles Municipal Code.

Response BC 1 – Direct Disposal has a Certificate of Occupancy to operate a “Recycling Material Sorting Facility” at 3720 Noakes Street. A recycling material sorting facility is defined as a “facility which accepts commingled or source-separated Recyclable Materials of various types, which are separated on the site using a manual or automated system. Under this definition, source-separated Recyclable Materials are those which are separated from the waste stream at their point of generation for the purpose of recycling. This may include baling or crushing operations for the purposes of efficiency of storage and transfer (volume reduction) but shall not include processing activities for other than temporary storage purposes. CDI material separated at the source (construction site) is classified as a recyclable material and MSW will be transferred and not processed. Refuse transfer stations are a permitted use in the M3 zone and there are no restrictions based on proximity to less intensive zoning designations. Recycling material sorting is not and will not be taking place at 3719 Noakes Street.

Comment BC 2 – There may be other permits required, and the MND is flawed in not identifying these anywhere in the document.

Response BC 2 – Other than the Solid Waste Facility Permit, all other permits necessary to operate the Direct Disposal facility are currently in place and were included in Appendix B “Draft TPR” Section 2.1 “Permits and Approvals” of the Draft IS/MND.

The following permits are in place:

- **Land Use Permit** – The facility has Certificates of Occupancy from the City of Los Angeles for a recycling materials sorting facility with outdoor storage of materials and parking at 3720 and 3719 Noakes Street. Reference Use of Land Permits 16016-20000-24736, 16020-20001-03077 and 16020-20001-03078.
- **City Non-Disposal Facility Element (NDFE)** – In July 2006, the City Council of Los Angeles, CA added the Direct Disposal C&D facility to the City of Los Angeles’s NDFE. The Direct Disposal NDFE was amended in June of 2018 to allow transfer and processing of up to 1,000 TPD of solid waste (reference NDFE Facility #85)
- **Storm Water Permit** - The facility has a General Industrial Storm Water Permit (NPDES) with the State Water Resources Control Board (SWRCB), WDID# 4 191019849. A Storm Water Pollution Prevention Plan (SWPPP) and Monitoring Program Plan (MPP) have been developed in compliance with State requirements.
- **Hazardous Waste Generator ID Number** - The facility has obtained a State Site Specific Identification number from the Department of Toxic Substances Control: CAL000284659. This number is used for all manifesting, record keeping, and reporting required for hazardous materials discovered through the load-checking program.

Comment BC 3 – The Notice of Availability and the MND describe the Project site as 3720 Noakes Street, Los Angeles, CA, but this is not fully accurate, as the Project clearly anticipates the use of the site across the street at 3719 Noakes Street as a "staging area," *see, e.g.*, TPR, attached to MND, at 6 (Figure 4) (PDF at 79), for vehicle queuing, container storage and parking (functions it is currently performing at the lower 175 tpd authorization currently held). Indeed, the MND states that:

Future improvements may also include a vehicle queuing lane, a truck scale, scale-house and offices at the 3719 Noakes Street property which will free up additional space at 3720 Nokes [sic] Street form [sic] material storage and processing.

Response BC 3 – The property located at 3719 Noakes Street is currently permitted and used by Direct Disposal, Inc. for outdoor storage, employee parking, and parking company trucks. Sorting and/or storage of solid waste is not taking place, or is planned to take place, on the 3719 Noakes Street property.

The Corrections and Modification Section, page CM-1, revises Section 1.6, "Proposed Project" paragraph 4, to eliminate vehicle queuing and a future scale/scale house at 3719 Noakes Street. In addition, Corrections and Modification Section, page CM-2, revises **Figure 2** to include a note that no storage or processing of solid waste will be permitted at the 3719 Noakes Street site.

Comment BC 4 – MND at 3 (PDF at 6). These latter functions are not apparently evaluated in the MND at all and therefore Direct Disposal's pursuance of them (with the Local Enforcement Agency's apparent tacit approval) would violate CEQA, if not other laws. But the larger point is that an environmental impact report ("EIR") should have been prepared because if the site description had properly included 3719 Noakes Street, as the TPR does, *see* TPR at 1 (PDF at 74),² there would be *more* than a fair argument that a significant impact on the environment could occur, because the Project involves more than 100 trucks per day visiting these two sites within 1,000 feet of residences, and that is the threshold for further review (and for required changes in a project) as set forth in the California Air Resources Board's ("ARB's") *Air Quality and Land Use Handbook* (2005) (a copy of which is provided as Attachment A hereto). *See* ARB, *Air Quality and Land Use Handbook* at 15. *See also* TPR at 8 (PDF at 81) (Table 2, describing "Facility Traffic" as 224 "Vehicles Per Day," including 148 Inbound Vehicles, and 22 Outbound Vehicles, all of which would be trucks). It seems apparent to us that Direct Disposal, the Local Enforcement Agency, and their CEQA consultant, Clements Environmental, must have been aware of this basic fact and deliberately excluded 3719 Noakes Street from the 1,000 foot review included in the MND at 10 (MND figure 6) (PDF at 13), and in the TPR at 4 (TPR Figure 4) (PDF at 77), for, as the MND acknowledges, there is residential development 1,010 feet from the "Project" if one excludes 3719 Noakes Street from the Project definition. *See* MND at 20 (Figure 7) (PDF at 23).

Response BC 4 – Solid waste activities are restricted to 3720 Noakes Street and there will not be any processing or storage of solid waste at 3719 Noakes Street. The use of 3719 Noakes Street for queuing has also been eliminated from the proposed project.

The “Air Quality and Land Use Handbook: A Community Health Perspective” was not intended to be used for evaluating CEQA impacts, but was intended to guide the location of sensitive land uses away from freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities.

The California Air Resources Board (CARB) is responsible for developing statewide programs and strategies to reduce the emission of smog-forming pollutants and toxics by mobile sources such as the solid waste collection vehicles currently using and anticipated to use the facility in the future. Limits on emissions from mobile sources are set by the CARB.

The CARB initially adopted the solid waste collection vehicle (SWCV) regulation in 2004 requiring all diesel SWCV’s with 1960 to 2006 engines and a GVWR over 14,000 lbs. to be retrofitted with particulate matter (PM) filters by December 31, 2010. Current regulations mandate that by January 1, 2023, nearly all trucks and buses will be required to have 2010 or newer model year engines to reduce particulate matter (PM) and oxides of nitrogen (NOx) emissions. To help ensure that the benefits of this regulation are achieved, starting in 2020, only vehicles compliant with this regulation will be registered by the California Department of Motor Vehicles (DMV).

The draft IS/MND did not find any potential for the project to adversely impact environmental health and safety with adoption of proposed mitigation measures. In response to the comment, an air quality analysis has been prepared and included in the Final IS/MND based on the California Emission Estimator Model (CalEEMod) version 2016.3.2 and use of the AQMD’s “Off-Road – Model Mobile Source Emission Factors”. Detailed worksheets are included in **Appendix CM-I** of the Final IS/MND. The air quality analysis did not result in any new impacts or mitigation measures.

It should be noted that Table 2 of the TPR provides an overview of traffic at 500 TPD based on one-way trips to the facility. The Draft IS/MND is based on the proposed 326 TPD increase in permitted throughput and the resulting increase in inbound and outbound trips during the AM and PM peak hours to determine potential traffic impacts.

The increase in permitted throughput from the 175 TPD to 500 TPD would generate an additional 274 daily vehicle trips (137 inbound and 137 outbound), a total of 14 AM peak hour trips (7 inbound and 7 outbound) and 10 PM peak hour trips (5 inbound and 5 outbound). No traffic impacts are anticipated as a result of the proposed increase in permitted tonnage and no traffic study is required based on the City of LA DOT Guidelines which require preparation of a Technical Memorandum if a project will add between 25 to 42 a.m. or p.m. peak hour trips, and the adjacent intersections are presently estimated to be operating at LOS E or F. The City Department of Transportation reviewed the project and determined that neither a traffic impact analysis or access/circulation study are not required.

Comment BC 5 – We'd like to know what notice regarding this Project has been provided to the residents on Los Palos Street, Prada Street, and La Puerta Street, and in what languages that notice was provided.

Response BC 5 – The notice was mailed to all owners and tenants within 500 feet of 3720 Noakes Street in English and Spanish and included occupants and owners on a portion of Los Palos Street. The notification radius did not encompass any properties on Prada Street or La Puerta Street.

Comment BC 6 – The second reason why the mislabeling of the Project as only involving 3720 Noakes Street is of concern is that the MND acknowledges that the Los Angeles Municipal Code ("LAMC") requires a CUP for a Recycling Materials Sorting Facility in an M3 Zone if the facility is less than 1,000 feet from an A, R, C, P, or PB zoned property. MND at 9 (PDF at 12), *citing* LAMC § 12.21A18(e). The "Facility," as reflected in the TPR (as well as, apparently, the City's Certificates of Occupancy noted at TPR page 9 (PDF at 82)), includes 3719 Noakes Street, and therefore a CUP is required. Additionally, the facility is operating 24 hours per day and therefore requires a CUP because it is less than 1,000 feet from an R zone.

Response BC 6 – The Direct Disposal recycling materials sorting facility is located at 3720 Noakes Street and meets the requirements of 12.21 A 18 (e). The facility has a valid certificate of occupancy (C of O) to operate as a recycling material sorting facility, and was been inspected by the Los Angeles Department of Building and Safety prior to issuance of the C of O. In addition, the Direct Disposal facility is inspected by the Local Enforcement Agency, which is part of the LADBS, on a monthly basis for compliance with local and State regulation. No recycling materials sorting is taking place on the 3719 Noakes Street property. 3719 Noakes Street will not be included in the Solid Waste Facility Permit.

Comment BC 7 – We also note that the MND's citation to LAMC section 12.21A18(e) appears to be inaccurate because that section covers "Recycling Materials Sorting Facilities," at which "no processing of Recyclable Materials" "shall be permitted." LAMC § 12.21A18(e)(3); the present facility shreds and "processes" "Recyclable Materials" and therefore does not qualify. It would appear that the facility would be addressed by LAMC section 12.21A18(f), for "Recycling Materials Processing Facilities," but that it still would not qualify without obtaining a CUP because under subdivision (f):

notwithstanding any other provisions of the Code, Recyclable Materials collected and processed on the site shall be limited to paper, cardboard, glass, metal, plastic and other items that are deemed appropriate by the Department of Building and Safety, Bureau of Sanitation, and Fire Department.

Response BC 7 – Direct Disposal facility recovers and recycles metal, plastic, wood, drywall, and inert materials. The facility is certified by the City of Los Angeles Bureau of Sanitation as diverting 77 percent of the material received from disposal in landfills. The facility has a valid certificate of occupancy from the Department of Building and Safety and a solid waste facility permit from the Local Enforcement Agency. Since the facility is more than 1,000 feet from a, R, C, P, or PB Zone or use.

Comment BC 8 – LAMC § 12.21A18(f)(3). The facility does not qualify because it now proposes to handle MSW. While LAMC section 12.03, Definitions, provides that Recyclable Materials may contain "yard waste," it does not provide for the handling of MSW. Additionally, while we do not have time to parse all the requirements of the LAMC right now, we have difficulty believing that a new transporter or handler of MSW would not be subject to a CUP or some other type of permit.

Response BC 8 – “Refuse Transfer Stations” are specifically permitted by right in the M-3 zone as set forth in the City’s “Zoning Use List No. 2”.

Comment BC 9 - MND at 7 (PDF at 10), Figure 4, includes a low-resolution image of a map of Los Angeles Area Community Plans. The resolution does not permit us to determine how the Project site is designated.

Response BC 9 – A better quality reproduction of the Los Angeles Area Community Plans map has been included in the Clarifications and Modifications Section, page CM-5.

Comment BC 10 - MND at 8 (PDF at 11) contains a Boyle Heights Community Plan map which is not much better. Again, we hope the residents in the close-by low density multifamily housing were served with notice by mail in their own first languages.

Response BC 10 – A better quality reproduction of the Boyle Heights Community Plan map has been included in the Clarifications and Modifications Section, page CM-6. Notices were provided to all tenants and property owners within 500-feet of 3720 Noakes Street where the Large Volume Solid Waste Facility Permit is being requested.

Comment BC 11 - MND at 9 (PDF at 12) indicates that the facility has been a "medium volume solid waste transfer and processing facility" since 2008. However, page 3 of the MND (PDF at 6) indicates that the current permit is for a 175 tpd "Medium Volume Direct Disposal Construction, Demolition and Inert Material Recovery Facility (MRF)," which would appear to exclude permission to transfer MSW and organic wastes. This is a significant change. We believe the MND is materially misleading in this respect.

Response BC 11 – The Final IS/MND has been revised to reflect the fact that the existing Solid Waste Facility Permit is for a Medium Volume Construction, Demolition and Inert (CDI) material recovery facility. See Comments and Modifications Section, page CM-7. The addition of MSW transfer was discussed and analyzed in the draft IS/MND.

Comment BC 12 - The TPR at 9 (PDF at 82) states under the bullet point "Environmental Documentation" that a Mitigated Negative Declaration and Notice of Determination "was [sic] adopted by the Local Enforcement Agency on June 7, 2019." We have reviewed the City's legal notices for MNDs going back to January 31, 2019, *see* <https://planning.lacity.org/eir/publication/mnd/pub.htm>, and have seen no reference to this Project. Additionally, a MND may only be approved, and a Notice of Determination adopted, *after* there has been public review of the MND, which has not been completed in the case of this MND at this point. *See* Pub. Res. Code§ 21152(a) (providing for filing of notices of determination with the county clerk "within five working days **after the approval or determination becomes final**) (emphasis supplied); The filing of a Notice of Determination would therefore be illegal under CEQA both under the terms of section 21152, **and** because it would discourage public comment on the Project by falsely suggesting to potential commenters that the Project was a *fait accompli*, which is opposite to CEQA's purposes.

Response BC 12 – The TPR was circulated as a draft document. It is provided as an informational item to assist in the public review process. The MND approval date was used as a place holder. A Notice of Determination (NOD) had not been prepared for the project at the time the Draft IS/MND

was circulated, and there would not be any notice on the City Planning website if one had been adopted since the LEA is the Lead Agency, not City Planning. There have not been any actions that discourage public comment on the Draft IS/MND. The NOD has been prepared and is included in the Final IS/MND.

Comment BC 13 - We went to the website where the Local Enforcement Agency ("LEA") made the MND available, see <https://www.ladbs.org/services/core-services/code-enforcement/leainformation> and note that it nowhere gave members of the public notice as to when comments on the Project were due under CEQA, and simply provides a short description and a link to the MND. We had to go to the Office of Planning and Research's ceqanet database in order to figure out what the deadline was. We think this lack of clarity is similarly contrary to CEQA's purposes.

Response BC 13 – Comment noted. Interested members of the public that visited the LEA website were directed there either by the public notices that were mailed to all property owners and residents within 500 feet of 3720 Noakes Street, or from a notice published in a general circulation newspaper (*The Downtown News*). Notices were also mailed to elected officials and community groups. Both the mailed and published notices included the dates of the comment period.

Comment BC 14 - The TPR at 13 (PDF at 86) indicates that MSW will be transferred within 48 hours but that if it is not transferred within 24 hours, it will be containerized, which more than likely means it will be stored at 3719 Noakes Street, which again means that a CUP is required.

Response BC 14 – Solid waste storage or processing will not be permitted at 3719 Noakes Street. The TPR provides that “containerized material will be stored within the project site boundaries in transfer trucks.” The project is a request for a Large Volume Solid Waste Facility Permit which is only applicable to the property at 3720 Noakes Street. All waste, including any residual waste from the C&D material sorting process, is removed from the site within 48 hours of receipt or generation.

Comment BC 15 – With regard to Air Quality impacts, the MND reaches the conclusion that the Project “will not increase any criteria pollutant,” and that, apparently, it will not expose sensitive receptors to substantial pollutant concentrations because “[t]he site is over 1,000 feet from residences and the nearest sensitive receptors.” MND at 19 (PDF at 22). We find the MND's analysis inadequate on both points:

First, with regard to criteria pollutants, we note, as mentioned before, that the TPR says the Project will lead to a total of 224 vehicles per day, of which 170 will be trucks. *See* TPR at 8 (PDF at 81) (Table 2, describing “Facility Traffic” as 224 “Vehicles Per Day,” including 148 “Inbound Vehicles,” and 22 “Outbound Vehicles,” described in footnote 1 as consisting of “Inbound Commercial Vehicles: 5 tons per load; Inbound Self-Haul Vehicles - 1 ton per load; [and] Outbound Trucks: 23 tons per load”). While some of the “Self-Haul Vehicles” may be small trucks, we anticipate they will all be trucks or else they will not be capable of transporting a ton of waste each. Attachment B to this letter is an updated Air Quality Impact Analysis for the Knox Business Park project in Riverside County, California. The Knox Business Park project Air Quality Impact Analysis appears to have been based on a total of 113 trucks idling per day (Attachment B PDF at 544, 546, 548, and 550), and the Project was expected to lead to emissions of oxides of nitrogen

or NOx (which is a precursor to ozone or smog) in the amounts of 354.35 pounds per day in the summer and 369.16 pounds per day in the winter. *See* Attachment B, letter at 2 (PDF at 2). This was in comparison to the South Coast Air Quality Management District ("SCAQMD") threshold of 55 pounds per day for operations, and thus yielded a significant impact, for which the applicant and the County of Riverside prepared an EIR. Based on this information, there is frankly no fair argument that the Project *does not* have a significant impact on the environment; and thus an EIR should have been prepared.

Response BC 15 – An air quality analysis has been prepared and included in the Final IS/MND based on the California Emission Estimator Model (CalEEMod) version 2016.3.2 and use of the AQMD's "Off-Road – Model Mobile Source Emission Factors". Detailed worksheets have been included in **Appendix CM-I** of the Clarifications and Modifications Section of this Final IS/MND.

The draft IS/MND did not find any potential for the project to adversely impact environmental health and safety with adoption of proposed mitigation measures.

It should be noted as well that the Knox Business Park Project referenced by the commentator generated 1,158 trips per day compared to the 274 additional trips associated with the Direct Disposal project.

Comment BC 16 – At first blush, the TPR appears inconsistent with the MND, which states in its traffic section that the Project will lead to "an additional 274 daily vehicle trips (137 inbound and 137 outbound)." MND at 35 (PDF at 38). However, we presume that the traffic analysis addresses "additional" trips due to the Project, meaning that there are apparently approximately 87 vehicles per day visiting the site presently; if so, this means that the ratio of vehicles presently to vehicles predicted at 500 tpd would be about 39%, which is roughly proportionate to the increased tonnage attributable to the Project ($175/500 = 35\%$). Additionally, 61% of the trips would be new trips ($274/448$ is approximately 0.61).

Response BC 16 – Regarding traffic, Table 2 of the Draft TPR provides the total number of trucks anticipated to use the facility at the proposed permit capacity of 500 tons per day.

It should be noted that Table 2 of the TPR provides an overview of traffic at 500 TPD based on one-way trips to the facility. The traffic analysis included in the Draft IS/MND is based on the proposed 326 TPD increase in permitted throughput and the resulting increase in inbound and outbound trips during the AM and PM peak hours which was used to determine that the proposed project did not result in any traffic impacts.

Comment BC 17 – Regarding exposure of sensitive receptors to Toxic Air Contaminants ("TACs") such as Diesel Particulate Matter ("DPM"), since the Project involves more than 100 trucks per day, there would be an argument that the Project leads to a significant impact even if it *were not* less than 1,000 feet from the nearest sensitive receptors, but it *is*. Accordingly, more analysis of impacts was required, based on the advice of the ARB in the *Air Quality and Land Use Handbook*, as noted previously.

Response BC 17 – See Response BC 4 and BC15.

Comment BC 18 –Still concerning Air Quality, the MND concludes that there will not be any significant increase in odors at the site, even though the Project involves the new receipt of MSW and organic and green wastes. The LEA's bare assurances do not eliminate a fair argument of a significant impact.

Response BC 18 – MSW will be limited to 100 tons per day and will be removed from the facility within 48 hours of receipt. An odor control plan (included as Appendix E of the Appendix A in the Draft IS/MND) will be implemented to reduce the potential for adverse impacts, and contact information will be posted at the facility to allow neighbors to notify the facility operator and local regulators including the Local Enforcement Agency and Air Quality Management District if odors are detected in the area. An overhead misting system is being required as a mitigation measure, and with the introduction of odor neutralizing agents, will mitigate potential impacts to less than significant levels.

Comment BC 19 – Regarding Hazards and Hazardous Materials, the MND acknowledges at 27 (PDF at 30) that incidental hazardous wastes will arrive on site. The MSW stream *will* include hazardous wastes and the discussion and proposed mitigation measures are inadequate.

Response BC 19 – Hazardous waste materials are not accepted at the facility. However, the Draft IS/MND acknowledges that hazardous materials such as used oil, paint, batteries or other similar items may be found in waste delivered to the facility, and that adequate resources will be available to safely and remove, store and dispose of those items. The proposed mitigation measures are based on industry standards and serve to protect employees and the environment.

Comment BC 20 – Concerning stormwater from the site, the LEA acknowledges that it could initially violate water quality standards, but claims the impacts would be reduced to less than significant through compliance with Best Management Practices and the Industrial Storm Water General Permit. MND at 29 (PDF at 32). We are not so sanguine; litter cleaning will not prevent contact with storm water of the materials inside the bins, leaking containers, etc.

Response BC 20 – Stormwater standards are established as part of the facility's General Industrial Stormwater Permit and Direct Disposal provides all stormwater monitoring data to the State as part of the "Stormwater Multiple Application and Report Tracking System" or SMARTS. Litter control and "best management practices" are seen as an effective means of preventing stormwater pollution. The purpose of testing and monitoring stormwater runoff is to determine what, if any pollutants, are contributing to stormwater contamination, determine the source or sources of that contamination and to develop specific mitigation measures as necessary.

Comment BC 21 – As to Land Use and Planning, the LEA asserts that the Project is developable "by right" such that there is no land use conflict. We disagree as noted above.

Response BC 21 – – "Refuse Transfer Stations" are specifically permitted by right in the M-3 zone as set forth in the City's "Zoning Use List No. 2".

Comment BC 22 – It is true that the Knox Business Park updated AQIA only addressed 113 trucks at Building D and the Project anticipated the development of a Building E as well; however, the AQIA still analyzed idling only at Building D and it still came up with a significant impact.

Response BC 22 – See Response BC 15.

Comment BC 23 – Regarding utilities and being served by a landfill with sufficient capacity, the MND is misleading in stating that the increase in use will only be to 400 tpd. (MND at 38, PDF at 41).

Response BC 23 – The Clarifications and Modifications Section revised Section 3.16.b “Utilities and Service System” as follows: “[t]he proposed project would increase the maximum daily tonnage from 175 TPD to 500 TPD”, and would not result in any adverse impacts to landfill capacity as discussed. See MND-38 on page CM-10.

Comment BC 24 – We request that you advise us immediately when the responses to the comments on the MND are made available by mail and email at collins@blumcollins.com and bentley@blumcollins.com, and that we be placed on the list of parties to be notified of all actions relating to this Project under Public Resources Code section 21092.2. Please forward this request to the director of the LEA.

Response BC 24 – Comment noted. Responses to comments, notices and the Final IS/MND will be provided as requested.

STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013



August 29, 2019

Jose Gutierrez
City of Los Angeles, Department of Building and Safety/LEA
221 N. Figueroa Street, Rm. 1250
Los Angeles, CA 90012

**Re: Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project
SCH 2019079096 - Mitigated Negative Declaration**

Dear Mr. Gutierrez:

The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings. Commission's Rail Crossings and Engineering Branch (RCEB) is in receipt of the Mitigated Negative Declaration for the proposed Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project (Project). City of Los Angeles, Department of Building and Safety/LEA is the lead agency (City).

C-1

The Project entails an application for a Large Volume Solid Waste Facility Permit (SWFP) to allow the expansion of an existing 175 ton per day (TPD) Medium Volume Construction, Demolition and Inert (CDI) Material Recovery Facility (reference Cal Recycle Solid Waste Facility Permit No. I 9-AR-1228) operated by Direct Disposal, Inc., located in the vicinity of Noakes Street crossing in the City of Los Angeles (CPUC No.003-3.58-C, DOT No. 811461Y). The proposed SWFP will allow processing and transferring up to 500 TPD of solid waste material.

C-2

The crossing is currently equipped with Commission Standard 1-R (crossbuck sign on a post) warning signs. RCEB has concerns about the increased traffic volume due to the proposed development. Any development project adjacent to or near a railroad right-of-way should be planned with the safety of rail corridor in mind. New development projects may increase pedestrian or vehicular traffic volumes not only on streets and at intersections, but also at nearby crossings. Traffic impact studies should analyze rail crossing safety and potential mitigation measures. Safety improvement measures may include improvements to existing at-grade crossings. Examples of improvements may include, but are not limited to: addition or upgrade of crossing warning devices, detectable warning surfaces and edge lines on sidewalks, and pedestrian channelization. Pedestrian and bicycle routes should be designed to clearly prohibit and discourage unauthorized access (trespassing) onto the tracks, except at authorized crossings.

C-3

In addition, construction or modification of public crossings requires authorization from the Commission. RCEB representatives are available to discuss any potential safety impacts or concerns at crossings. Please continue to keep RCEB informed of the project's development. More information can be found at: <http://www.cpuc.ca.gov/crossings>.

C-4

Jose Gutierrez
SCH 2019079096
August 29, 2019

If you have any questions, please contact Chi Cheung To at (213) 576-5766, or cct@cpuc.ca.gov.

Sincerely,



Chi Cheung To
Senior Utilities Engineer Specialist
Rail Crossings and Engineering Branch
Rail Safety Division

CC: State Clearinghouse, state.clearinghouse@opr.ca.gov
Peggy Ygbuhay, pygbuhay@up.com

Comment C-1 – The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings. Commission's Rail Crossings and Engineering Branch (RCEB) is in receipt of the Mitigated Negative Declaration for the proposed Direct Disposal Large Volume Solid Waste Transfer/Processing Facility Project (Project). City of Los Angeles, Department of Building and Safety/LEA is the lead agency (City).

Response C-1 – Comment noted. The proposed project does not require the construction or alteration of any rail crossings.

Comment C-2 – The Project entails an application for a Large Volume Solid Waste Facility Permit (SWFP) to allow the expansion of an existing 175 ton per day (TPD) Medium Volume Construction, Demolition and Inert (CDI) Material Recovery Facility (reference Cal Recycle Solid Waste Facility Permit No. 19-AR-1228) operated by Direct Disposal, Inc., located in the vicinity of Noakes Street crossing in the City of Los Angeles (CPUC No.003-3.58-C, DOT No. 811461Y). The proposed SWFP will allow processing and transferring up to 500 TPD of solid waste material.

Response C-2 – Comment noted. The rail crossing serves an Archer Daniels Midland Company milling and grain storage facility.

Comment C-3 – The crossing is currently equipped with Commission Standard 1-R (crossbuck sign on a post) warning signs. RCEB has concerns about the increased traffic volume due to the proposed development. Any development project adjacent to or near a railroad right-of-way should be planned with the safety of rail corridor in mind. New development projects may increase pedestrian or vehicular traffic volumes not only on streets and at intersections, but also at nearby crossings. Traffic impact studies should analyze rail crossing safety and potential mitigation measures. Safety improvement measures may include improvements to existing at-grade crossings. Examples of improvements may include but are not limited to: addition or upgrade of crossing warning devices, detectable warning surfaces and edge lines on sidewalks, and pedestrian channelization. Pedestrian and bicycle routes should be designed to clearly prohibit and discourage unauthorized access (trespassing) onto the tracks, except at authorized crossings.

Response C-3 – As shown in Appendix CM-II, the project does not exceed the City of Los Angeles Department of Transportation's threshold for preparation of a traffic study.

The Direct Disposal facility, as well as all the other businesses on Noakes Street, generate traffic and heavy truck trips that must contend with multiple rail crossings in the area. It appears that the majority of these are rail crossings are for spur lines serving specific businesses and are not part of larger rail corridors. The rail spurs are used on a limited basis, and the businesses utilizing the rail spurs have safety measures in place. Pedestrian access is limited since the area is served by heavy industrial uses, and there are no sidewalks. No bike lanes or designated bike routes are located in the area as well.

Comment C-4 – In addition, construction or modification of public crossings requires authorization from the Commission. RCEB representatives are available to discuss any potential

safety impacts or concerns at crossings. Please continue to keep RCEB informed of the project's development. More information can be found at: <http://www.cpuc.ca.gov/crossings>.

Response C-4 – Comment noted. The proposed project does not entail modification of any public rail crossings.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



August 29, 2019

Jose Gutierrez
City of Los Angeles
Department of Building and Safety/LEA
221 N. Figueroa St., Rm.1250
Los Angeles, CA 90012

RE: Direct Disposal Large Volume Solid Waste
Transfer/Processing Facility Project
Mitigated Negative Declaration (MND)
SCH# 2019079096
GTS# 07-LA-2019-02728
Vin. LA-5/ PM 15.063

Dear Mr. Gutierrez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project entails an application for a Large Volume Solid Waste Facility Permit (SWFP) to allow the expansion of an existing 175 ton per day (TPD) Medium Volume, Construction, Demolition and Inert (CDI) Material Recovery Facility (reference CalRecycle Permit no. 19-AR-1228) operated by Direct Disposal, Inc., and located at 3720 Noakes St. in the City of Los Angeles. The proposed SWFP will allow processing and transfer of up to 500 TPD of solid waste material. The 54, 136 square foot site is developed with a one-story, 12,200 square foot building that houses the tipping area and processing equipment including mechanical screens and an elevated sort line. The site also contains a truck scale and associated 600 sf scale house/office as well as outdoor storage areas. Off-site surface parking is provided at 3719 Noakes Street. No new floor area is proposed.

The nearest State facility to the proposed project is Interstate 5. After reviewing the Mitigated Negative Declaration (MND), Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please contact project coordinator Mr. Carlo Ramirez, at carlo.ramirez@dot.ca.gov or (213) 897-4230 and refer to GTS# 07-LA-2019-02728.

Sincerely,

A handwritten signature in blue ink, appearing to read "Miya Edmonson", is written over the word "Sincerely,".

MIYA EDMONSON
IGR/CEQA Branch Chief
Cc: Scott Morgan, State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Comment CT-1 – The nearest State facility to the proposed project is Interstate 5. After reviewing the Mitigated Negative Declaration (MND), Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

Comment CT-1 – Comment noted.

Comment CT-2 – As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

Comment CT-1 – Comment noted. Other than the typical vehicles such as roll-off trucks, transfer trucks and end-dump trucks no oversized-transport vehicles that would require Caltrans oversized vehicle permits are anticipated to use the facility.