

APPENDIX B

COMMENTS RECEIVED ON THE NOP/INITIAL STUDY AND RESPONSE TO COMMENTS

Comments
Response to Comments

INTRODUCTION

This appendix contains the comments received during the public review period on the Notice of Preparation/Initial Study (NOP/IS) for the proposed 2003 Air Quality Management Plan (AQMP). A total of 16 comment letters were received. The comment letters are provided below and each comment has been numbered. The responses to each comment are presented in this Appendix following the comments.

Michael Krause

From: Joe Calavita [jcalavit@arb.ca.gov]
Sent: Thursday, September 19, 2002 4:12 PM
To: Michael Krause
Subject: Re: NOP



Card for Joe
Calavita

> Michael:

David Mallory from our Stationary Source Division has noticed in the South Coast AQMP CEQA NOP that the description of CONS-6 does not reflect the consumer product measure in the Clean Air Plan and is not what ARB has in mind for a consumer product measure. I'm not sure the implications of this, but if you would like more information, please contact David at 916-445-8316.



1-1

Joe

> Michael Krause wrote:

>

> done.

>

> -----Original Message-----

> From: Joe Calavita [mailto:jcalavit@arb.ca.gov]

> Sent: Wednesday, August 28, 2002 12:54 PM

> To: Michael Krause; Laki Tisopulos

> Subject: NOP

>

> Mike:

>

> I hope you recieved our fax. We neglected to delete a reference to pesticides on the 3rd line from the top on page 1-5. Could you please do so to your draft.

>

> Thanks,

>

> Joe



1-2

COMMENT NO. 1
E-MAIL FROM CALIFORNIA AIR RESOURCES BOARD

Joe Calavita
September 19, 2002

Response 1-1

The control measures in the AQMP have been revised to be consistent with CARB's Draft State and Federal Element of South Coast State Implementation Plan, Section IV, Long-Term Strategy, December 2002. CONS-6 has been removed by CARB as a long term control strategy and has been deleted from the 2003 AQMP.

Response 1-2

The comment was noted and this change was incorporated into the NOP/IS.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
120 S. SPRING ST.
LOS ANGELES, CA 90012
PHONE (213) 897-4429
FAX (213) 897-1337



*Flex your power!
Be energy efficient!*

September 25, 2002

IGR/CEQA cs/020912
NOP
2003 Air Quality Management Plan
Vic. LA/ORE/SB/RIV-VAR
SCH# 2002081137

Mr. Steve Smith
South Coast Air Quality Management District
21865 E. Copley Dr.
Diamond Bar, CA 91765

Dear Mr. Smith:

Thank you for including the California Department of Transportation in the environmental review process for the above-mentioned program document. Based on the information received, we have the following comments:

AQMP Attainment Strategies - Page 1-5 – Paragraph 1

Will the lack of adoption or partial adoption of a control measure impact the AQMP's control strategy? Numerous control measures which were not adopted or partially adopted are listed for implementation.



2-1

Page 1-5 – Paragraph 2

Will the long-term measures be merely converted into the 2003 AQMP or will they be incorporated into the Plan? If the long-term measures are converted into the Plan, will it be a direct conversion or will an adjustment factor be made to the long-term measures?



2-2

New Short-and Intermediate-Term Stationary Control Measures - Page 1-6 – Paragraph 3

BCM-07 - Further reductions from fugitive dust sources: The quantification of PM₁₀ benefits will also enable the maximization of other existing and future control measures that are non-PM₁₀ measures. Will the PM₁₀ emission reduction benefits be included as part of the PM₁₀ attainment demonstration? Have the ambient PM₁₀ levels in the basin been adequately quantified to determine the cost effectiveness of PM₁₀ measures, such as the number of miles of unpaved roads required to be paved or chemically treated/stabilized) to achieve the prescribed reductions?



2-3

"Caltrans improves mobility across California"

Mr. Steve Smith
September 25, 2002
Page Two

Purpose of the 2003 AQMP - Page 1-15

Other than the 8-hour ozone and PM_{2.5} standards, are there other air quality standards that are new? If not, the AQMP should specify the "8-hour ozone" standard. 2-4

Environmental Factors Potentially Affected - Page 2-6 – 111.c - Air Quality

How will the 2003 AQMP address California's new legislation on Carbon Dioxide emissions (greenhouse gas contributing to global warming)? 2-5

Page 2-31 – XV11. a), b) & f) - Transportation/Traffic

It is expected that the population growth within the Basin will have a significant impact on the regional transportation system. Travel demand has increased at a faster rate than population growth. How will the AQMP reconcile the travel demand and mobile source emissions resulting from the projected 2025 population growth. Will the rate of growth in travel continue to exceed forecasted population growth. What mobile source measures are likely to offset emissions from expected growth in VT and VMT? Which measures, if implemented, will slow down the rate in VT and VMT growth to satisfy the requirement for a substantial reduction? 2-6

Transportation Control Measures (TCMs)

Transportation Control Measures (TCMs) identified in the State Implementation Plan (SIP) were officially submitted on February 21, 1972. (CFR Title 40, Volume 3 - Part 52, Subpart F – California) 2-7

Section 52.263 – Priority treatment for buses and carpools – Los Angeles Region

This section identifies specific freeway facilities (e.g. for implementation of carpool, bus, concurrent flow or contraflow lanes). Because the AQMP/SIP is an iterative document, some identified TCMs have been implemented and other TCMs have not, while other measures appear to have been implemented in the place of those mentioned. The outdated measures, those not implemented, should be deleted from this section of the SIP. It should be noted, that this section of the SIP has never been amended to update the TCM information under this section. 2-8

If you have any questions regarding our comments, refer to our internal IGR/CEQA Record # cs/020912, and please do not hesitate to contact me at (213) 897-4429.

Sincerely,



STEPHEN BUSWELL
IGR/CEQA Branch Chief

cc: Mr. Scott Morgan, State Clearinghouse

COMMENT NO. 2
LETTER FROM CALIFORNIA DEPARTMENT OF TRANSPORTATION

Mr. Stephen Buswell
September 25, 2002

Response 2-1

The lack of adoption or partial adoption of control measures could impact the ability of the Basin to attainment the ambient air quality standards. Four of the 1997 AQMP long-term VOC control measures under SCAQMD jurisdiction have been included in the 2003 AQMP. The impact of the control measures on air quality is presented in Subchapter 4.1, Air Quality. In addition, alternatives to the implementation of the control measures in discussed in Chapter 5, Alternatives.

Response 2-2

Four of the 1997 AQMP long-term VOC control measures under SCAQMD jurisdiction have been included in the 2003 AQMP as short- or intermediate-term control measures. Additional new control measures have also been added to the 2003 AQMP. The emission benefits associated with each control measure have been estimated in the 2003 AQMP based on the latest information available. New long-term measures proposed by the SCAQMD as well as CARB have been proposed in the 2003 AQMP. See Chapter 2 of the EIR for more details on the control measure.

Response 2-3

The control measures proposed as part of BCM-07 are described in Appendix IV-A of the 2003 AQMP. This control measure is intended as a means to ensure compliance in those areas that are subject to high levels of PM10.

The ambient levels of PM10 are summarized in Subchapter 3.1 of the Draft EIR for the 2003 AQMP. Sufficient data are available to determine that the Basin does not comply with state or federal PM10 ambient air quality standards. Sufficient information is not available to determine the cost effectiveness of BCM-07 which is expected to include improved compliance test methods, soil stabilization requirements, modified work practices, construction project signage, and mandatory use of track-out control devices.

The SCAQMD has already implemented rules to control fugitive dust from unpaved roads so this measure is not included as part of the 2003 AQMP. The SCAQMD already Rule 403 (Fugitive Dust from transportation, handling, construction or storage activities) and Rule 1186 (PM10 Emissions from Paved and Unpaved Roads that includes requirements for clean-up of material onto paved roads, use of certified street sweeping equipment and treatment of high use unpaved roads).

Response 2-4

In 1997, the U.S. EPA promulgated new federal standards for ozone (8-hour) and PM_{2.5} standards. The 2003 AQMP includes an initial assessment of progress towards attaining the new standards but is not required to demonstrate attainment of these standards. The implementation guidelines for the new standards have not been finalized, although preliminary feedback from the U.S. EPA indicates that the likely attainment dates for PM_{2.5} and ozone standards will be 2014 and 2021, respectively. The State Implementation Plans to demonstrate attainment with the standards are expected to be due in 2007. A separate planning process will be required in the future to determine control strategies to comply with these standards. Implementation of the control strategies including in the 2003 AQMP will help to achieve some of the emission reductions that are expected to be necessary to comply with the 8-hour ozone and PM_{2.5} standards.

Response 2-5

Table 1-6 of the 2003 AQMP lists the Clean Air Act planning requirements addressed by the 2003 AQMP which include pollutants for which ambient air quality standards have been developed. The 2003 AQMP address does not address carbon dioxide emissions. The air quality planning process for control of greenhouse gases has not been developed and emission standards for carbon dioxide have not been developed. The control of greenhouse gases is expected to be largely regulated by CARB.

Response 2-6

Demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment), developed by SCAG for their 2001 RTP, were used to estimate future emission (see 2003 AQMP, Chapter 3). Current forecasts indicate that this region will experience a population growth of 15 percent by the year 2010 with a 20 percent increase in vehicle miles traveled. Therefore, the 2003 AQMP predicts that the growth in travel will be greater than the growth in population. The 2003 AQMP does not estimate air emissions through 2025.

As discussed in the AQMP (See Chapter 10), uncertainties exist in the demographic and growth projects for the future base years. As projections are made to longer periods (i.e., over 10 or more years), the uncertainty of the projections become greater.

The control measures proposed in the 2003 AQMP are included in Chapter 2 of the EIR (also see Chapter 7 of the 2003 AQMP). SCAG has proposed transportation-related control measures that are aimed at reducing VMTs. A number of control measures are aimed at reducing emissions from mobile sources including FSS-05, FSS-06, FSS-07, TCM-1A, TCM-1B, and TCM-1C. Virtually all of the control measures to be implemented by CARB or the U.S. EPA also would reduce emissions from on-road and off-road mobile sources (see Chapter 2 of the 2003 AQMP EIR). These measures would all reduce emissions from mobile sources and are expected to provide sufficient emission reductions, even though the population and growth of VMTs are expected to increase. No specific control measures are proposed that would slow down the rate of population growth.

The jurisdiction for a number of transportation improvements is with the Southern California Association of Governments (SCAG) who is responsible for preparing and implementing the Regional Transportation Plan (RTP). The RTP establishes the transportation control measures that will be implemented by the SCAG to help with the attainment of air quality goals in the Basin.

The central objective of the control measures in the RTP, and now incorporated into the 2003 AQMP, is to increase (or at least maintain at current levels) the proportion of trips made using modes other than single occupancy vehicles. This remains the primary goal of the Region's transportation control strategy and HOV projects are an important component of such efforts.

Response 2-7

The transportation control measures that are part of the 2003 AQMP are identified in Chapter 2 of the EIR for the 2003 AQMP and discussed in detail in Appendix IV-C of the AQMP.

Response 2-8

The transportation control measures that are part of the 2003 AQMP are identified in Chapter 2 of the EIR for the 2003 AQMP and discussed in detail in Appendix IV-C of the AQMP.



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October 4, 2002

Mr. Michael Krause
CEQA
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

RE: Comments on the Notice of Preparation for a Draft Environmental Impact Report for the 2003 Air Quality Management Plan – SCAG No. 1 20020457

Dear Mr. Krause:

Thank you for submitting the **Notice of Preparation for a Draft Environmental Impact Report for the 2003 Air Quality Management Plan** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Notice of Preparation** and have determined that the proposed Project is regionally significant per SCAG mandates for regionally significant projects that directly relate to policies and strategies contained in the Regional Comprehensive Plan and Guide (RCPG) and Regional Transportation Plan (RTP). The proposed Project is an update of an air quality regulatory plan. CEQA requires that EIRs discuss any inconsistencies between the proposed project and applicable general plans and **regional plans (Section 15125 (d))**. If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided.

Policies of SCAG's Regional Comprehensive Plan and Guide and Regional Transportation Plan...

October 4, 2002
Mr. Michael Krause
Page 2

**COMMENTS ON THE PROPOSAL TO DEVELOP A
DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE
2003 AIR QUALITY MANAGEMENT PLAN
SCAG NO. 1 20020457**

PROJECT DESCRIPTION

The proposed Project would update the 1997 Air Quality Management Plan as amended in 1999 in the following ways: updating of baseline emission inventories; revision and incorporation of partially implemented measures and control measures; and inclusion of incentive/credit programs to achieve emission reduction commitments.

3-4

SUMMARY OF STAFF COMMENTS

- There is the potential that air deposition related to the AQMP will contribute considerably to water quality impairments. The Water Resources section in the Draft EIR should substantially evaluate the potential environmental effect of air deposition on the region's water quality.

3-5

- SCAG is currently engaged in modeling efforts in support of the upcoming 2004 Regional Transportation Plan (RTP), and, as such, the growth and population forecasts referenced on page 1-5 in the NOP, are likely to change. At present, Staff anticipates that revised and updated growth and socio-demographic forecasts for the SCAG region, which includes the South Coast Air Basin (SCAB), will be available early in 2003.

3-6

- Page 1-5, first paragraph, Specification of Transportation Control Measures:

Reference to the Final 2001 Regional Transportation Improvement Program (RTIP) should be replaced or augmented with language pointing to the current 2002 RTIP, which is expected to be approved by Federal Agencies in early October 2002. More detail on the current status of SCAG Plans is as follows:

3-7

SCAG's 2002 RTIP was adopted by SCAG's Regional Council on August 1, 2002 and has been forwarded to state and federal agencies for approval. This report is consistent with the two latest operating documents, the 2001 RTIP and the 2001 Regional Transportation Plan (RTP), including the 2001 RTP and RTIP Amendments. The 2001 RTIP was approved by the federal agencies on September 25, 2001. The 2001 RTP was approved for all areas in June 2001, with

the exception of the PM₁₀ areas in the San Bernardino County portion of the Mojave Desert Air Basin (MDAB) and the Coachella Valley portion of the Salton Sea Air Basin (SSAB), which were approved on August 3, 2001. A copy of the 2002 RTIP, including a detailed listing of projects proposed under TCM-01, can be reviewed at www.scag.ca.gov/rtip/

3-7
Cont'd

- Pages 1-6 to 1-10, New Short- and Intermediate-Term Stationary Control Measures

While SCAG is not responsible for, and so not normally concerned with stationary and area source control strategies, three of the proposed Control Measures are of interest to SCAG's Regional Council, and Staff expects to provide input as the EIR develops.

3-8

MSC-01 – Promotion of Lighter Color Roofing and Road Materials (page I-8): SCAG supports and is independently working to initiate these and other heat island mitigation measures (such as tree planting, albedo modification, and the interjection of landscaping elements into impervious surfaces such as urban parking lots), as part of its efforts to mitigate the air quality impacts of mobile source emissions. SCAG Staff have actively sought to engage the SCAQMD and other regional agencies in an effort to cooperatively develop a regional strategy.

3-9

MSC-02 – Promotion of Catalyst-Surface Coating Technology (page I-9): SCAG supports and is independently working to initiate the adoption of technologies such as the application of titanium dioxide to downtown parking structures and areas that experience high concentrations of vehicle idling and slow-moving traffic (hot spots), as part of its efforts to mitigate the air quality impacts of mobile source emissions.

3-10

WST-02 – Emission Reductions from Composting (page I-10): SCAG's Solid Waste Task Force, which reports to the Energy and Environmental Committee (EEC), comprised of local and sub-regional elected officials, has been actively following the development of SCAQMD's Proposed Rule 1133, which seeks to quantify and control emissions from composting and related operations. While SCAG is supportive of the effort, we reserve the right to comment further as the AQMP takes shape.

3-11

- Page I-10, paragraph 3, Possible Measures to be Considered By Other Agencies:

SCAG should be listed as one of the other agencies in the context of transportation strategies and improvements.

3-12

October 4, 2002
Mr. Michael Krause
Page 4

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The **Air Quality Chapter** Core Actions of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the Draft EIR for the 2003 Air Quality Management Plan.

- 5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.*
- 5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

3-13

CONCLUSION

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

3-14

COMMENT NO. 3
LETTER FROM SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Mr. Jeffrey Smith
October 4, 2002

Response 3-1

The SCAQMD understands that the 2003 AQMP is considered regionally significant. The proposed 2003 AQMP complements the SCAG Regional Comprehensive Plan and Regional Transportation Plan, and includes applicable control measures from the RTP. The SCAQMD is specifically excluded from infringing on existing city or county land use authority (California Health & Safety Code §40414). Land use and other planning considerations are determined by local governments and no present or planned land uses in the region or planning requirements will be altered by the proposed AQMP.

Response 3-2

The response to the issues outline in your attachment are addressed below.

Response 3-3

A 45-day public comment period will be provided on the Draft 2003 AQMP EIR.

Response 3-4

See Chapter 2 of the 2003 AQMP EIR for a full description of the proposed 2003 AQMP.

Response 3-5

A discussion of water quality impacts associated with the implementation of the 2003 AQMP are included in the 2003 AQMP EIR (see Chapter 4.3). Implementation of the 2003 AQMP is expected to reduce emissions, including PM10 emissions (about 2.0 to 6.0 tons per day), thus reducing the potential for deposition. Therefore, no significant impacts on water quality due to increased deposition of PM10 are expected due to implementation of the 2003 AQMP.

Response 3-6

Demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment), developed by SCAG for their 2001 RTP, were used to estimate future emissions (see 2003 AQMP, Chapter 3). These represent the most recent socio-demographic forecasts provided by SCAG.

Response 3-7

Comment is noted. The 2003 AQMP includes the most recent transportation control measures developed by SCAG (see Appendix IV-C of the 2003 AQMP).

Response 3-8

The SCAQMD understands that SCAG has interest in some of the stationary source control measures.

Response 3-9

Your comment is noted. MSC-01 is included in the 2003 AQMP.

Response 3-10

MSC-02 has been removed and is no longer included in the 2003 AQMP.

Response 3-11

Your comment is noted. WST-02 is included in the 2003 AQMP and Phase 1 of which has been proposed as the SCAQMD Rule 1133 series. Phase II of WST-02 will be focusing on greenwaste and foodwaste.

Response 3-12

SCAG's control measures are identified in the 2003 AQMP (see Chapter 2, Project Description).

Response 3-13

See Response 3-1. All applicable environmental resources have been considered in the Draft AQMP EIR.

Response 3-14

Mitigation measures have been identified where significant environmental impacts have been identified.

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Roles and Authorities

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG) is a **Joint Powers Agency** established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's **Metropolitan Planning Organization** and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. '134, 49 U.S.C. '5301 et seq., 23 C.F.R. '450, and 49 C.F.R. '613. SCAG is also the designated **Regional Transportation Planning Agency**, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082 respectively.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the **South Coast Air Quality Management Plan**, pursuant to California Health and Safety Code Section 40460(b)-(c). SCAG is also designated under 42 U.S.C. '7504(a) as a **Co-Lead Agency** for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining **Conformity** of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. '7506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for **reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans** required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for **Inter-Governmental Review** of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21083 and 21087, Environmental Impacts Reports of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

Pursuant to 33 U.S.C. '1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the authorized **Areawide Waste Treatment Management Planning Agency**.

SCAG is responsible for preparation of the **Regional Housing Needs Assessment**, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the Association of Bay Area Governments, the Sacramento Area Council of Governments, and the Association of Monterey Bay Area Governments) for preparing the **Southern California Hazardous Waste Management Plan** pursuant to California Health and Safety Code Section 25135.3.

Revised July 2001

Michael Krause

From: Jeffrey Smith [SMITHJ@scag.ca.gov]
Sent: Thursday, September 26, 2002 4:34 PM
To: Steve Smith
Cc: Michael Krause; Molly Hoffman; Sylvia Patsaouras; Jim SIMS; Ashwani VASISHTH
Subject: Comments on the NOP / 2003 AQMP

Steve,

Per our phone conversation this afternoon, SCAG is currently reviewing the NOP for a Draft EIR for the 2003 AQMP. We requested an additional week to complete our review. Thanks for your consideration in granting our request. SCAG will complete the review of the NOP and submit comments by the end of next week, October 4, 2002.

Jeff

Mr. Michael Krause
Page 2
September 20, 2002

support a conclusion in the Initial Study that there would not be significant impacts to Utility and Service Systems.

4-2
Cont'd

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation on this project. Metropolitan supports the SCAQMD's efforts to improve air quality. If we can be of further assistance, please contact Jeff Ford of the Environmental Planning Team at (213) 217-5687.

4-3

Very truly yours,



Laura J. Simonek
Manager, Asset Management
and Facilities Management Unit

JDF/rdl
(Public Folders/EPT/Letters/19-SEP-02A.doc - Michael Krause)

COMMENT NO. 4
LETTER FROM METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Ms. Laura Simonek
September 20, 2002

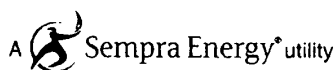
Response 4-1

The potential impacts of the 2003 AQMP on water demand have been included in Chapter 4.4 of the Draft EIR. The impacts of the 2003 AQMP on water demand have been determined to be less than significant.

Response 4-2

The potential impacts of the 2003 AQMP on water demand have been included in Chapter 4.4 of the Draft EIR. Additional environmental review will be completed as each of the control measures are implemented. Details on the potential impacts of the control measures on water supplies will be further addressed at that time.

Response 4-3



Howard D. Levin
Environmental Strategy
Manager

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September 27, 2002

Mr. Michael Krause
c/o CEQA
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

RE: Draft Environmental Impact Report - 2003 AQMP

Dear Mr. Krause:

I am writing on behalf of Southern California Gas Company regarding the Notice of Preparation of a Draft Environmental Impact Report. Southern California Gas is the nation's largest natural gas distribution utility, serving 18 million people through 5 million gas meters in more than 530 communities. Headquartered in Los Angeles, we are a subsidiary of Sempra Energy, a Fortune 500 company based in San Diego.

The service area of Southern California Gas encompasses 23,000 square miles of diverse terrain throughout most of Central and Southern California, from Visalia to the Mexican border. Our expertise and experience, as well as our size, scope and resources, make us a leader in the natural gas industry. In total, we deliver nearly 1 trillion cubic feet of gas annually, or about 5% of all

While the increased utilization of natural gas vehicles in the SCAQMD will result in an increase in natural gas use; we disagree that it will create significant effects on peak and base period demands for natural gas nor will it result in the need for new or substantially altered natural gas utility systems.

5-2

Recently the California NGV Partnership developed an estimate of the penetration of Light Duty and Heavy Duty NGVs throughout the State of California over the next three to ten years. The California NGV Partnership is an alliance of state and federal air quality, transportation and energy agencies, together with vehicle and engine manufacturers, fuel providers, transit and refuse hauler associations, and other interested stakeholders, seeking to promote the demonstration and commercialization of natural gas engine and fueling technology. Along with estimating vehicle penetration, they also made an estimate of the statewide emission benefits; estimated alternative fuel usage and the amount of gasoline and diesel fuel displaced. A copy of their estimates is attached.

5-3

Using the Partnership's most aggressive scenario it is estimated that in 10 years, on a statewide basis there would be 1,076,000 gasoline gallons equivalent of natural gas used for these vehicles. This equates to 860,800 cubic feet of natural gas per year. It was further estimated that approximately 60% of the total NGVs would be in the SCAQMD; thus these vehicles would consume about 516,480 cubic feet of natural gas per year. This level of natural gas use would represent only 0.051648% of the total amount of gas delivered annually by Southern California Gas. Based on this it is apparent that the very small increase in natural gas usage for transportation will not result in the need for new or substantially altered natural gas utility systems. This small level of increased natural gas use will easily be accommodated by the normal design and operation of the Southern California Gas transmission and distribution system.

While the increase in natural gas use from NGVs is very small it is also noted that any emission impacts of this increased use of natural gas are essentially self-mitigating. The use of natural gas for NGVs will displace the use of gasoline and diesel in the same vehicle population. This reduced use of gasoline and diesel mitigates any air quality impacts from the increased use of natural gas.

5-4

We ask that you take the above information into account in the preparation of the final EIR that will be developed for the 2003 AQMP. We will be glad to provide you additional information in this area if that would be helpful; we will also participate in the public workshop that will be scheduled in the future.

5-5

Sincerely,



Howard D. Levin

cc: J. Brunton V. Gonzales L. Wallace
M. Eaves S. Simons

COMMENT NO. 5
LETTER FROM SOUTHERN CALIFORNIA GAS COMPANY

Mr. Howard D. Levin
September 27, 2002

Response 5-1

The potential energy impacts associated with the 2003 AQMP are addressed in Chapter 4 of the Draft EIR.

Response 5-2

The potential energy impacts associated with the 2003 AQMP are addressed in Chapter 4 of the EIR. The EIR concluded that the impacts of implementation of the 2003 AQMP on natural gas resources would be less than significant.

Response 5-3

Your comments regarding the impacts of the conversion of the vehicle fleet from gasoline to natural gas are appreciated. The EIR concluded that the impacts of implementation of the 2003 AQMP on natural gas resources would be less than significant. Section 4.2.5.2 discusses the reduction in fuel consumption, and the increased need for natural gas, in year 2010.

Response 5-4

See Response 5-3. The SCAQMD concurs that the impacts associated with the use of natural gas, in some cases will displace the use of gasoline and diesel, resulting in emission benefits from these sources.

Response 5-5

Your comments have been incorporated into the Draft EIR and the SCAQMD appreciates your input.

September 27, 2002
Attachment

**Natural Gas Vehicle Partnership
Objectives**

Scenario	Vehicle Penetration	Statewide Emission Benefits, Estimated (tons per year)					Fuel Usage, Estimated (gal/yr)			Fuel Displacement, Estimated (gal/yr)	
		HC	Nox	CO	PM	CNG (GGE)	LNG	Gasoline Equivalent	Diesel Equivalent		
3-year	LDV	70	145	2400	--	55 million	--	55 million	--	--	
	HDV	--	750	--	100	28 million	95 million	--	82 million	--	
5-year	LDV	190	400	6500	--	150 million	--	150 million	--	--	
	HDV	25,000	1880	--	260	70 million	240 million	--	205 million	--	
10-year	LDV	500,000	1060	2220	36400	795 million	--	795 million	--	--	
	LDV*	250,000	530	1100	18200	256 million	--	256 million	--	--	
	HDV	100,000	--	3600	--	281 million	955 million	--	817 million	--	

Assumptions

- 3 - Year **LDV: 75% Fleet @ 2000 gge/yr; 25% Consumer @ 700 gge/year HDV: 75% LNG & 25% CNG @ 7500 DGE/year**
- 5 - Year **LDV: 75% Fleet @ 2000 gge/yr; 25% Consumer @ 700 gge/year HDV: 75% LNG & 25% CNG @ 7500 DGE/year**
- 10 - Year **LDV: 75% Consumer @ 700 gge/yr; 25% Fleet @ 2000 HDV: 75% LNG & 25% CNG @ 7500 DGE/year**

* Alternative Scenario

mandates of AB 939 et seq. Since solid waste management is no longer limited to meeting disposal needs but also includes source reduction, recycling, and composting, the evaluation of the AQMP's solid waste impact potential should consider all possible effects of the plan on the whole echelon of solid waste management.

6-2
Cont'd

b. In the evaluation of the impact potential on agricultural resources, the IS concludes that no impact to existing farmlands will result from the AQMP. The IS does not indicate if any AQMP control measures would apply to agriculture. If there are such measures, then the DEIR should evaluate the potential effects of these measures on the use of farm equipment/machines, aerial spraying of pesticides, the traditional on-site burning of farm waste, and soil tilling operation. The AQMP may not directly result in the depletion of farmlands but may still be able to adversely affect agricultural operations on existing farmlands.

6-3

c. With respect to the AQMP's potential impact on transportation/traffic and parking capacity, the IS concludes that no impacts will result, on the basis that the plan will not cause an increase in traffic. However, the AQMP will include control measures that require the use of alternative fuel vehicles, such as electrical vehicles. The use of electrical vehicles normally requires special parking facilities that allow recharging of the vehicles. The need for these special parking facilities implies that there may be a deficiency in the amount of parking capacity for alternative vehicles resulting from the implementation of the AQMP.

6-4

d. With respect to the AQMP's potential impact on recreation, the IS concludes that no impacts will result, on the basis that the plan will not increase the demand for new neighborhood and regional parks. However, the AQMP will include control measures that regulate the use of off-road recreational vehicles and recreational watercraft. Compliance with these measures may require construction of new or modification to existing recreational parks, or installation of special facilities in these parks in order to facilitate the use of the regulated motorized recreational devices. The DEIR should examine this issue.

6-5

-1

Thank you for the opportunity to review the NOP and IS. If you have any questions regarding the above comments, please call me at (909)486-3283. The Department would appreciate the opportunity to review a draft 2003 AQMP when it is available.

6-6

Sincerely,



Sung Key Ma
Planner

-2

COMMENT NO. 6
LETTER FROM THE RIVERSIDE COUNTY WASTE MANAGEMENT
DEPARTMENT

Sung Key Ma
September 27, 2002

Response 6-1

The Draft EIR for the 2003 AQMP is a Program EIR and focuses on the impact of the overall implementation of the 2003 AQMP on the environment. The Draft EIR includes a discussion on the impacts of the 2003 AQMP on the generation of solid and hazardous waste and related facilities (see Chapter 4 of the EIR). The potential impacts to regulated facilities are included in the Draft EIR to the extent that impacts are known. Impacts associated with specific control measures at landfills have not been identified. This type of information will be available as the rules are promulgated.

Response 6-2

Your comments on the waste disposal, reduction, recycling and composting are noted. The impacts associated with composting (WST-02) are included in the Draft EIR (see Chapter 4). The SCAQMD has already approved Rules 1133, 1133.1 and 1133.2 in January 2003. These rules already require that operators of co-composting operations achieve VOC and ammonia emission reduction targets using any combination of composting methods and control technologies included but not limited to enclosures, aeration systems, best management practices, process controls and add-on control devices.

WST-02 in the AQMP would identify control measures to reduce VOC and ammonia emissions from greenwaste composting and food composting operations. The AQMP notes that the cost impact for this industry would be substantial and, therefore, has not proposed specific control methods. Rather, the SCAQMD is proposing to continue to work with the stakeholders including the California Integrated Waste Management Board, sanitation districts and local municipalities to seek funding sources and identify feasible and cost-effective control options for greenwaste composting operations while maintaining the SB939 objectives.

Response 6-3

As indicated in the NOP/IS, no control measures have been proposed that would be expected to have physical impact agricultural resources (e.g., convert prime farmland, conflict with zoning for agricultural use or result in the conversion of farmland to non-agricultural uses).

Some of the control measures could require control of off-road diesel engines, which could impact agricultural as well as a number of other industries. The impacts associated with these types of control measures are addressed in their appropriate section of the EIR. For example, the impacts associated with controlling off-road diesel engines are addressed in the EIR in Chapter

4.1 - Air Quality Impacts, and the impacts associated with reformulated pesticides are addressed under hazards.

Response 6-4

The impacts of using alternative fuels are addressed in the appropriate sections of the EIR, include the Energy Impact section and the Air Quality Section (see Chapter 4 of the EIR). The potential impacts of using alternative fuels include energy impacts (requirements for additional electricity) and air quality impacts (need to generate additional electricity, as well as construct new support facilities). No increase in traffic or the requirement for additional parking is expected from implementation of the control measures identified in the AQMP.

Response 6-5

The Initial Study concluded that the control measures in the AQMP would not generate population growth and would not increase the use of existing parks and would not require the construction or expansion of recreational facilities. The impact of the construction and implementation of the control measures on other resources, e.g., air, hydrology/water quality, solid/hazardous waste have been addressed in the appropriate section of the EIR.

Response 6-6

Notice will be provided to the Riverside County Waste Management Department when the document is available.

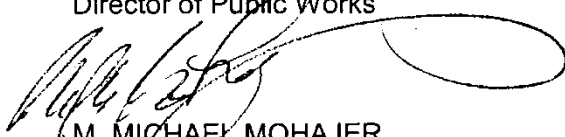
Mr. Michael Krause
October 2, 2002
Page 2

waste (solid and/or hazardous) generated. Therefore, the Draft Environmental Impact Report must clearly identify all such potential impacts and discuss potential mitigation measures, including but not limited to impacts from BCM-08, CTS-07, CTS-10, and WST-02.

Should you have any questions regarding the comments above, please contact the undersigned at (626) 458-3500.

Very truly yours,

JAMES A. NOYES
Director of Public Works



M. MICHAEL MOHAJER
Assistant Deputy Director
Environmental Programs Division

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COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

COMMENT NO. 7
LETTER FROM THE COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

James A. Noyes
M. Michael Mohajer
October 2, 2002

Response 7-1

The SCAQMD understands that the County of Los Angeles Department of Public Works is responsible for various aspects of the management of solid/hazardous wastes, regulation of wastewater, and management of underground storage tanks.

Response 7-2

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September 27, 2002

Michael Krause
c/o CEQA
South Coast Air Quality Management District
21865 East Copley Drive
Diamond Bar, California 91765-4182

*By Telecopier and
U.S. First Class Mail*

Re: *Comments on Notice of Preparation of a Draft Environmental Impact Report -
2003 Air Quality Management Plan*

Dear Mr. Krause:

This letter is submitted on behalf of the County of Orange ("County") in its capacity as the owner and operator of John Wayne Airport ("JWA") located in Costa Mesa, California. This letter contains the County's written comments on the Notice of Preparation ("NOP") of a Draft Environmental Impact Report ("DEIR") - 2003 Air Quality Management Plan ("AQMP"), issued August 29, 2002, by the South Coast Air Quality Management District ("SCAQMD" or "District"). In conjunction with its review of the NOP, the County has also obtained and reviewed a copy of the Initial Study for the DEIR, dated August 29, 2002 ("Initial Study"). The County appreciates the opportunity to provide comments on the NOP/Initial Study.

The issues associated with the 2003 AQMP, as it relates to the air transportation industry,

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In this regard, our comments are intended to serve the following principal objectives:

1. First, we want to reiterate a position which we have consistently articulated regarding the role of the air carrier airports in the Basin in addressing the air quality challenges which face our region. Specifically, the County recognizes and acknowledges that JWA can and should play a role in helping to reduce unnecessary air emissions in the Basin. It is important, however, for us to reemphasize the regulatory authority of the District and the regulatory authority of the local public entities which own and operate the air carrier airports in the Basin. 8-3

2. Second, in the past, we have voiced concerns about the availability of sufficient data to fully address the problems inherent in attempting to prepare airport emission strategies for airports in the Basin. In preparing the 2003 AQMP, it is essential that the District take a meaningful look at whether there is in fact an air quality “problem” at the commercial airports in the Basin and, if so, the scope and extent of the “problem.” There are important questions and issues which must be addressed by the District as part of any regulatory approach to dealing with aircraft or airport emissions, including the accuracy of the baseline emissions inventory, particularly in light of the events of September 11, 2001, and the cost effectiveness of any regulatory strategy. Without careful attention and response to these issues, the District will be unable to structure appropriate and effective air quality regulations which might affect the operations of the air carrier airports in the Basin. This is particularly true in light of the parking restrictions, curbside access restrictions and vehicle and luggage inspections that have been implemented as a result of September 11, 2001, and that clearly outweigh any air quality issues that may arise from implementing these measures. 8-4

3. Third, as you may know, the Orange County Board of Supervisors (“Board”) recently approved modifications to an existing “settlement agreement” which implements certain limitations on operations at JWA for noise control purposes. The modifications to the settlement agreement permit enhancements to commercial airline operating capacity and commercial airline facilities at JWA as early as January 1, 2003. It is important that any projected future inventory in the 2003 AQMP for the Basin include this approved increase in capacity and facilities at JWA. 8-5

4. Fourth, and finally, according to the NOP/Initial Study, the 2003 AQMP will include at least three control measures to be considered for adoption by other agencies which will be intended to regulate emissions from jet aircraft, emissions from airport 8-6

GENERAL COMMENTS

BASELINE EMISSION INVENTORY

The NOP states that the proposed 2003 AQMP would update the 1997 AQMP, as amended in 1999, by updating the baseline emission inventory from 1993 to 1997. The District should recognize that a primary concern relating to the use of a baseline to measure emissions reductions is the current failure of this method to provide some type of “credit” to the airports for the significant emission reduction measures that have already been implemented which reduce air quality impacts associated with airport operations. One example, among many which could be chosen, was the planning decision of the County in adopting its Master Plan for JWA in 1985. At that time, the decision was made to site the new passenger terminal in direct proximity to the takeoff end of the air carrier runway at JWA, rather than in the center of the airfield where the previous terminal had been located. This decision had important air quality benefits, including, among other things, the reduction of the aircraft taxiing distance required during the takeoff cycle. In connection with the approval of the Master Plan, numerous other air quality mitigation measures were implemented to provide: (i) more efficient fuel operations and consumption; (ii) the ability to manage aircraft operations in a more efficient manner; (iii) a reduction in the fugitive dust generated by aircraft activity at JWA; (iv) an improvement in traffic circulation within the vicinity of JWA; and (v) the possibility for use of alternative fuels. Since 1985, a number of other infrastructure improvements and regulatory measures have been implemented by JWA to provide air quality benefits.

8-7

In order to maintain equity and to avoid inadvertently “penalizing” those who voluntarily implemented significant air quality reduction measures prior to or during 1997, the 2003 AQMP should provide some type of “credit” to “sources” for those past efforts.

In addition, many projections in the current AQMP are based upon inaccurate State Implementation Plan (“SIP”) emission projections and travel trends/projections. Impacts to the aviation industry as a result of the events of September 11, 2001, have resulted in a change in travel trends and projections. These changes will necessarily require adjustments in the SIP emission projections and recognition of the sometimes limited ability of airlines and airports to implement proposed regulatory strategies. Prior to the development and approval of any regulatory strategies,

8-8

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SIP emission projections should be updated to more accurately reflect current and future aviation activity. In addition, the SIP projections should be modified to reflect updates in Emission and Dispersion Modeling System (“EDMS”) modeling - updates which have indicated that SIP projections were inaccurate when compared to actual monitoring results. This is especially critical in connection with particulate matter monitoring results.

8-8
Cont’d

ACCOMMODATION OF ANTICIPATED GROWTH IN FACILITIES

One of our major concerns is the impact which any regulations may have on the feasibility of expanding existing airport facilities, including the need of the airports to continue with their planned growth to accommodate anticipated demand and to reach the planned capacity of the airports. Generally, many facility improvements which increase airport efficiency tend to reduce air quality impacts. Projects which facilitate passenger access to the airport, and aircraft access to the airfield without excessive delays, provide important air quality benefits.

8-9

In addition, it is critically important for the District to understand that by increasing capacity at airports in the Basin, emissions from other transportation sources, principally automobiles, will be reduced. This is especially true for some of the smaller airports in the Basin, including JWA. As JWA is able to increase operational capacity, as is the case with the recently approved settlement agreement amendment, the number of automobile trips that must be made to other Basin airports, including LAX, will decrease. Therefore, it is important that any future “budget” projections provided in the 2003 AQMP reflect this increased capacity at JWA.

8-10

COMPLIANCE WITH NOTICE AND COMMENT PROCEDURES

The CALIFORNIA ADMINISTRATIVE PROCEDURES ACT (“APA”) requires meaningful public participation in the adoption of administrative regulations by state agencies. CAL.GOV.CODE §11346.5. The purpose behind this requirement is to provide interested persons with an opportunity to submit information and suggest alternatives to the proposed rule. Public input also operates to educate the agency as to the impact of the proposed rule on affected parties, thus improving the agency’s decision-making process. *Schenley Affiliated Brands Corp. v. Kirby* (1971) 21 Cal.App.3d 177; *Chocolate Mfrs. Ass’n v. Block* (4th Cir.) 755 F.2d 1098, 1105.

8-11

It is important for the airports in the Basin to understand the administrative and procedural process for discussing and presenting possible regulatory strategies during the rulemaking process, outside of the CEQA mandated notice and comment process. The airports and source operators in the Basin would like to work closely with the District in formulating any regulatory strategies relating to airport and aircraft emissions. It is critically important that representatives from each of

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the air carrier airports in the Basin be given the opportunity to work closely with the District to explore airport regulatory strategies which are reasonable, technically feasible to implement, and within the proper scope of the District's regulatory authority.

8-11
Cont'd

COST EFFECTIVENESS

The CALIFORNIA CLEAN AIR ACT requires the District Governing Board to determine that the AQMP is a cost-effective strategy that will achieve attainment of the state standards by the earliest practicable date. CAL. HEALTH & SAFETY CODE §40913(b). In addition, the AQMP must include an assessment of the cost-effectiveness of available and proposed measures and a list of the measures ranked from the least cost-effective to the most cost-effective. *Id.* at §40922.

8-12

It is not clear from the NOP/Initial Study that the 2003 AQMP will in fact provide an analysis of the cost-effectiveness of regulatory measures affecting airports or the airline industry as mandated by California law. Therefore, it is also unclear whether the overall costs associated with regulations affecting airports in the Basin are justified in terms of expected emission reductions. It is important for the District to take a "hard look" at this issue and to provide the airports in the Basin with information which measures the full costs of any possible regulatory program in terms of the increase in emission reduction costs versus program and improvement costs.

8-13

In addition to the program and improvement costs, we continue to be concerned about the effect any emission reduction strategies will have on new entrant air carriers, especially relatively small air carriers with a limited fleet mix, and the importance of maintaining a competitive airline environment in the Basin. A regulatory scheme which would inhibit competition would probably result in significantly higher air fares to and from the Basin than in other parts of the country, which could in turn have a seriously negative effect on the local economy. This issue must also be taken into account when addressing the cost effectiveness of the proposed measures.

8-14

FEES SHOULD BE MANDATED ONLY WHEN THEY CAN BE RECYCLED INTO THE REGIONAL ECONOMY

In preparing the 2003 AQMP, we strongly advocate that the District include a mechanism whereby penalty fines collected for AQMP noncompliance and the fees collected in connection with implementation of the proposed regulations be redistributed into the regional economy. For example, such funds could be allocated to offset administrative and improvement costs of compliance with the AQMP incurred by JWA and other airports in the Basin.

8-15

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SPECIFIC COMMENTS

The NOP/Initial Study includes discussion of two categories of potential control measures to be included in the 2003 AQMP - control measures to be considered by other agencies, and control measures to be implemented by SCAQMD. The specific comments of the County directed toward control measures to be considered by other agencies are presented below. It does not appear that any of the control measures to be implemented by SCAQMD are directed toward airports or airport operators. Therefore, the County, in its capacity as the airport proprietor at JWA, is not providing comments on these measures at this time.

8-16

CONTROL MEASURES TO BE CONSIDERED BY OTHER AGENCIES

Appendix A of the NOP/Initial Study provides a summary of possible measures to be considered by other agencies. (See, Initial Study, Appendix A.) Of specific concern are the control measures directed towards aircraft and airports, *i.e.*, those labeled "Airport -1", "Airport -2," and "Airport-3." (Appendix A, p. A-6.) The NOP/Initial Study does not provide the specific language of each control measure and, instead, describes the three in the following broad, non-specific terms:

AIRPORT-1 *Pursue Approaches to Reduce Emissions from Jet Aircraft - Cleaner Engines/Retrofit Controls, Aerodynamic Design, Fleet Purchase Strategy, Emission-Based Landing Fees, Cleaner Fuel, Operational Measures.* Strategy could include airline manufacturers committing to purchase aircraft with cleanest engines available.

8-17

AIRPORT-2 *Pursue Approaches to Reduce Emissions from Airport Ground Service Equipment - Infrastructure, Electrification and Alternative Fuels, Carrier Fleet Average, Retrofit Controls.* Require airports to install infrastructure for electric or alternative fuel GSE, accelerate turnover of existing GSE fleet, perform technical assessment of zero emission vehicle GSE, and retrofit diesel GSE with particulate filters or oxidation catalysts.

AIRPORT-3 *Pursue Approaches to Reduce Emissions from Vehicles Traveling To and From Airports - Airport Operator Fleets, Alternative Fuel/Electric Infrastructure, Taxi/Shuttle Fleets, Consumer/Employee Transportation Options, Education.*

By presenting the measures in concept only, the NOP/Initial Study raises more questions than it answers. As to those measures directed at reducing emissions from jet aircraft, the County is

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concerned with a number of potential issues, including direct accountability, cleaner engines/retrofit controls, fleet purchase strategies and emission-based landing fees. As to those control measures related to reducing emissions from airport GSE, the County is concerned about potential inconsistencies between these measures and the Memorandum of Understanding (“MOU”) between the airlines, the California Air Resources Board (“CARB”), and the Environmental Protection Agency (“EPA”) concerning GSE emission reductions at airports in the Basin. As to those control measures directed at reducing emissions from vehicles traveling to and from airports, it is unknown what strategies will be proposed, specifically, to reduce vehicle miles traveled (“VMT”) and related vehicle emissions. The County is specifically concerned with both the accuracy and completeness of existing data that SCAQMD is relying upon for emission reduction estimates. The County provides comments on each of these topics as follows:

8-17
Cont'd

Measures to Reduce Jet Aircraft Emissions

Direct Accountability

One main concern we have with any measure to reduce emissions from jet aircraft is that it requires direct accountability. We therefore want to reemphasize the position which has been consistently conveyed to the District regarding the role of the air carrier airports in the Basin in addressing the air quality challenges which face our region. Specifically, we continue to believe that, any air quality regulations should ensure direct accountability for emissions. Consequently, we are pleased that the Airport-1 control measures appear to require that the commercial airlines operating at Basin airports, rather than the airport proprietor, be responsible for any reduction in emissions for activities associated with their operations. JWA strongly supports direct accountability for emissions related to aircraft operations.

Holding the airlines, rather than the airport proprietor, responsible for compliance with aircraft emission reductions requirements has significant advantages. For air quality purposes, the relevant question is not what emissions are being generated by aircraft operations to specific airports in the Basin, but what emissions are being generated by the airlines at all of the commercial airports in the Basin. If an airline decides between now and 2015 to shift the emphasis of its operations from one airport in the Basin to another airport in the Basin, it should be able to do so without having to “acquire” airport specific “emission credits,” in order to ensure that the airlines are responding to the market place for air travel. By focusing compliance on the airline operations in the Basin as a whole, that flexibility would be preserved. By focusing on specific airports, air carrier flexibility to respond to evolving market demand in the Basin would be seriously impaired, if not precluded entirely.

8-18

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Cleaner Engines/Retrofit Controls/Fleet Purchase Strategy

Any measure proposing the establishment of cleaner engines/retrofit controls or a fleet purchase strategy for commercial aircraft operators in the Basin as a means of regulating commercial aircraft emissions should provide an adequate time period for the commercial airlines to meet the final goals. In addition, commercial airlines should not be penalized for failing to comply with interim goals if the final goals are met. This issue is important for the following reason.

The cost of acquiring new aircraft (or even new engines or retrofit controls) makes it impractical (actually - impossible) for the air carriers to turn over their fleets, or to make equipment acquisition plans based upon short-term cycles. It is much more reasonable to allow an airline to make a purchasing decision regarding a \$50 million aircraft over a ten- or fifteen-year period (i.e., 2003 until 2013 or 2018) rather than over a shorter time period. Providing the airlines with a ten- or fifteen-year period provides the airlines with a fair and reasonable opportunity to respond to the EPA's and District's rule(s) in so far as it affects their aircraft (or engine) purchase and retirement planning. Interim goals may be a reasonable approach as well, but it would not be reasonable or appropriate to adopt a regulation where the airlines are penalized for not meeting the short-term goals if they, in fact, are able to meet the ultimate reduction or compliance requirement.

8-19

Emission-Based Landing Fees

The County has a number of concerns with respect to the implementation of any type of emission-based landing fee program. First, it is unclear, among other issues, what type of emissions the regulatory measure would be targeting for emission reductions; how such a regulatory fee system would be monitored and administered; what would be used as a baseline for monitoring purposes; and whether general aviation aircraft would be regulated under the fee-based program.

8-20

Second, for many of the reasons discussed above, airport-enforced operational emission-based landing fees have continually been opposed by the Federal Aviation Administration ("FAA"). Third, emission-based landing fee programs reduce emissions, in theory, through activity reductions or the use of the "cleanest fleet" where emission-based landing fees are imposed. Under a program of this type, presumably commercial aircraft and general aviation aircraft owners or operators pay a fee for each landing operation based upon some type of emission measurements. It is unclear to what extent these types of measures impact the natural evolution of the commercial and general aviation community, and, in particular the new entrant aviation community, and to what extent they may effect competition in the Basin.

8-21

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Fourth, any regulatory program that results in imposing an emission-based landing fee for each operation at an airport in the Basin would result in an enormous administrative burden to airports throughout the Basin. The District and EPA should consider whether the airport proprietor should be able to delegate this responsibility to the airlines and fixed-base operators (“FBOs”) directly. Fifth, the District and EPA should consider whether certain types of general aviation should be exempt from a control measure of this type and whether separate categories should be created for specific general aviation activities, including touch and go and training flights.

8-22

Sixth, and finally, we strongly advocate that, if any type of emission-based landing fees are imposed, the District include a mechanism whereby landing fees collected for noncompliance be redistributed to offset administrative costs of compliance with this regulatory measure by JWA and other airports in the Basin.

8-23

Alternatives to this type of emission-based regulatory fee program include providing airlines with the opportunity to purchase emission reduction credits from stationary sources where emission reduction technology is more readily available and cost effective. Any control measures that include “market-based” regulations for the airline industry which would allow emission reduction credits to be traded between the airlines, however, could create “property rights” that would put new entrant carriers at a disadvantage. Therefore, any provision for trading should be administered by the EPA to help ensure that new entrant air carriers will not be at a competitive disadvantage. Specifically, in developing “market-based” control measures to reduce jet aircraft emissions, we suggested that the following be given serious consideration:

8-24

1. No airline should be able to acquire “property rights” in air emissions which can be sold to their competitors. If the air emissions are property rights, then a carrier which enters bankruptcy and stops operating in the Basin would, effectively, remove air emission “capacity” which would limit air travel capacity in the Basin until the bankruptcy process allows those “credits” or “rights” to be sold to some other potential user - a process which could take years.
2. A new entrant airline should be able to enter the South Coast marketplace without having to first “purchase” air emission “rights.” If a new entrant can only commence service by buying “rights” from a competitor, they will not be able to enter the market in a manner which will allow them to be competitive. If the District is considering a “market-based” system to accommodate new entrants and to deal with airlines which reduce or eliminate service in the

8-25

8-26

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Basin, the District should first take a careful look at the history of the “marketplace” for “slots” in the four FAA-defined “high density” airports (JFK, LaGuardia, Washington Ronald Reagan and Chicago O’Hare). That “market” has been utterly ineffective in accommodating new entrants, and it has not resulted in the type of “market” which the FAA undoubtedly anticipated when the system was first introduced. Essentially, no airline will sell “credits” (or the equivalent of a “slot”) to any airline which it views as a potential competitor for any price less than the price necessary to make that airline noncompetitive in the seller’s markets. In effect, a market-based system would actually have anti-competitive consequences rather than encouraging free competition among the airlines and future possible new entrants.

8-26
Cont’d

- 3. If an airline abandons or reduces its service in the Basin for any reason, its’ emission “credits” should be returned automatically, without payment or compensation, and without demand or specific action by the EPA, to a central “bank” administered by the EPA. New entrants could then be allocated “credits” (if that is the essential regulatory approach eventually implemented upon by the EPA) from that “bank” without charge, allowing the new entrant a full and competitive opportunity to commence service in the Basin. A strong “use-it or lose-it” provision should be included in the regulation to avoid incentives for anti-competition behavior by incumbent airlines.

8-27

In addition to some type of emission reduction credit system, the State should apply pressure to the federal government to provide NASA with more funding opportunities for the research and development of cleaner jet aircraft propulsion systems and airframe designs. Finally, pressure should also be applied to the federal government to provide funding opportunities for the research and development of an improved air traffic control system that would reduce aircraft emissions by reducing flight times and engine taxiing times for aircraft at airports in the Basin.

8-28

Measures to Reduce Emissions From Ground Service Equipment

We are concerned that the NOP/Initial Study does not mention the MOU between the airlines and CARB/EPA concerning emission reduction targets for certain types of GSE at airports in the Basin. There is also no mention of JWA’s aggressive and proactive approach to providing the infrastructure improvements necessary to accommodate the MOU conditions and requirements. We

8-29

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believe that this MOU should not be superceded by new regulations unless they are approved as "backstop" measures as part of the MOU process.

Measures To Reduce Vehicular Emissions

Estimated Reduction in Emissions and VMT

It is important that in estimating reductions in the number of future airport generated trips, that the District be seriously concerned with both the accuracy and completeness of the existing data that it relies upon for these estimates. For example, data obtained from LAX for purposes of estimating the percentage change that will result in airport generated trips through implementation of various proposed measures is clearly inapplicable to the other airports in the Basin. The average round trip for passengers traveling to and from JWA is fifteen (15) miles, substantially less than the average round trip for passengers traveling from LAX. If the District's process for the development of measures for the Basin is based upon data that is inaccurate, then the AQMP itself will be seriously flawed; and it creates the risk that airports located, and the airlines operating, in the Basin will be faced with expensive regulatory requirements for air quality "problems" which may not exist, or which may be over described.

In addition, any measure by the District which may affect the operational capacity of one or more of the airports in the Basin might be perceived as providing air quality impact reductions at the constrained airport, but this does not mean that there has been a net air quality benefit in the Basin generally. If passenger traffic is reduced at one airport in the Basin because of regulatory constraints, that traffic may be served at another Basin airport or the displaced passengers may choose to drive to their ultimate destination. For environmental purposes, the significant difference is that those passengers will have to either drive further to reach the second airport to obtain the air service that they desire, or they will have to drive to their final destination, thereby increasing regional VMT and traffic congestion - with the concomitant negative impacts on air quality.

It is crucial that any measures imposed on airports in the Basin "balance" the air traffic among the Basin airports in a manner which best serves air quality and transportation/circulation objectives. One effective air quality strategy for airports in the Basin would be for the District to encourage capacity enhancements, where feasible, so that each airport has the maximum ability to serve the demand in its immediate market area rather than diverting local passengers to more distant airports.

GATZKE DILLON & BALLANCE LLP

Michael Krause
September 27, 2002

COMMENT NO. 8
LETTER FROM GATZKE DILLON & BALANCE LLP

Lori D. Ballance
September 27, 2002

Response 8-1

The SCAQMD understands that your comments are submitted on behalf of the John Wayne Airport.

Response 8-2

The 2003 AQMP provides the project description for the AQMP EIR and provides the general basis for the AQMP.

Response 8-3

Please note that the 2003 AQMP identifies the control measures that need to be implemented by various local, state and federal agencies, including the SCAQMD, the Southern California Association of Governments, the California Air Resources Board and the U.S. Environmental Protection Agency. The AQMP is not limited to stationary sources or to sources within the jurisdiction of the SCAQMD.

Response 8-4

The 2003 AQMP includes estimates of the base (1997) and future year (2008, 200, 2002, 2005, 2006, 2007, 2008, 2010, and 2020) emission inventories (see Appendix III of the AQMP). Information to produce an emission inventory for the Basin is obtained from the SCAQMD, CARB, California Department of Transportation, and SCAG. The SCAQMD develops the point source inventories based on the emissions data reported by point source facilities in the 1996/97 Annual Emissions Reporting (AER) program.

In 1999, an inventory study was conducted for the SCAQMD to develop the 1997 aircraft emissions for commercial, general aviation and military airports. The aircraft activity data (i.e., number of aircraft operations by air craft types) was obtained from commercial airport operations, and from FAA general aviation reports. The U.S. EPA's Emissions Dispersion Modeling Systems (EDMS) was used to calculate aircraft emissions. Emissions from commercial aircraft were calculated based on the aircraft type, engine type, number of engines, time-in-mode emission factors, mixing height, and the number of landing and take-off cycles. General aviation aircraft emissions were primarily calculated using AP-42 emission factors. For future years, SCAG's 2025 project emission inventories for commercial airports and growth factors for general aviation airports were utilized. For intermediate years, emissions for commercial airports were interpolated between 1999 and 2025 based on the passenger level (i.e., million air passengers) specified for each commercial airport in the 2001 Regional Transportation Plan.

Response 8-5

See Response 8-4. The future year inventories included projections for growth as developed by SCAG in the 2001 Regional Transportation Plan. The air traffic in Orange County was estimated to increase by a factor of 1.797 or about an 80 percent increase between 1997 and 2010.

Response 8-6

As noted, the AQMP includes several measures that would be implemented by CARB to control emissions from aircraft and emissions from vehicles traveling to/from airports.

Response 8-7

See Response 8-4. The emission inventory takes into account the rules and regulations adopted by the SCAQMD, CARB and the U.S. EPA between September 20, 1996 and October 31, 2002. The emission inventory provides the basis for the current air quality and provides the basis for the future air emission inventories. In order to demonstrate compliance with ambient air quality standards, an accurate estimate of the current inventory is necessary to assure compliance with the ambient air quality standards. It is not feasible to provide “credit” to all sources that have implemented air quality reductions in the past and ensure that the ambient air quality standards will be achieved in the future. Past control efforts are reflected in the baseline inventory and further reduction potential would be assessed based on technical feasibility and cost-effectiveness.

Response 8-8

See Response 8-4. The 2003 AQMP has used the best inventory data available.

Response 8-9

Your comment is noted and these type of control options could be pursued by CARB under some of its proposed control measures.

Response 8-10

The inventory for mobile sources were based on projections for growth as developed by SCAG in the 2001 Regional Transportation Plan. The overall assumption is that population growth will result in an increase in total vehicle miles traveled in the Basin. Although there maybe a decrease in some vehicle trips traveling to LAX, the overall population growth would still result in an overall increase in total vehicle miles traveled. Also, John Wayne Airport is not an international airport. Therefore, people would still be expected to travel to Los Angeles Airport for international flights.

Response 8-11

Your comment is noted and the SCAQMD is interested in working with all stakeholders in the development of air quality rules and regulations. Please note that the control measures that would impact airports are expected to be adopted by CARB and the applicable notices and input on rulemaking would need to be addressed to CARB.

Response 8-12

A socioeconomic analysis is being prepared that examines the cost of implementation of the control measures in the 2003 AQMP.

Response 8-13

See Response 8-12.

Response 8-14

See Response 8-12.

Response 8-15

The SCAQMD already has a creative penalty policy that can be used to distribute fees collected from violations of its rules. No penalty fees are collected by the SCAQMD for AQMP noncompliance, only for noncompliance with rules and permit conditions. If there are fees beyond those necessary to support the AQMD costs of regulation, such as mitigation fees, these would be used to mitigate emission impacts of airport operations.

Response 8-16

The SCAQMD understands that Gatzke Dillon & Balance have no specific comments on control measures to be implemented by the SCAQMD at this time.

Response 8-17

Please see Chapter 2 of the AQMP EIR and 2003 AQMP, Appendix IV-B – State and Federal Element of the South Coast State Implementation Plan. Chapter G of that document provides a more detailed discussion of the potential control measures that impact airports and jet aircraft. Note that there has been changes to the control measures. Also, please note that some of the details of the control measures will need to be developed during the promulgation of the rules.

Response 8-18

Please see the 2003 AQMP, Appendix IV-B – State and Federal Element of the South Coast State Implementation Plan. Chapter G of that document provides a more detailed discussion of the potential control measures that impact airports and jet aircraft.

Your comments regarding airline operations in the Basin as a whole are noted and such comments are appropriate as more definitive rules and regulations are developed.

Response 8-19

Please see the 2003 AQMP, Appendix IV-B – State and Federal Element of the South Coast State Implementation Plan. Chapter G of that document provides a more detailed discussion of the potential control measures that impact airports and jet aircraft. The time required to implement control measures is considered during the rulemaking process.

Response 8-20

Please see the 2003 AQMP, Appendix IV-B – State and Federal Element of the South Coast State Implementation Plan. Chapter G of that document provides a more detailed discussion of the potential control measures that impact airports and jet aircraft. The details of a fee-based program would need to be developed during the rule development phase.

Response 8-21

See Response 8-20.

Response 8-22

See Response 8-20.

Response 8-23

See Responses 8-20 and 8-15.

Response 8-24

See Response 8-17 regarding control measures applicable to the airline industry. It is premature to discuss the details of emission reductions credits for emissions from aircraft as no such program has been proposed. The details of any specific rule or regulations will be outlined in more detail at the time that the rule/regulation is promulgated. These comments will be forwarded to rulemaking staff at each agency.

Response 8-25

See Response 8-24 regarding emission reductions credits for emissions from aircraft.

Response 8-26

See Response 8-24 regarding emission reductions credits for emissions from aircraft.

Response 8-27

See Response 8-24 regarding emission reductions credits for emissions from aircraft.

Response 8-28

Your comments regarding the need for additional research for cleaner jet engines and improved air traffic control systems are noted.

Response 8-29

Your comments regarding the MOU are noted. However attaining air quality standards may require emissions reductions beyond those already recommended in the MOU. The need for and feasibility of such reductions will be considered in the rulemaking process. Any excess emission reductions are taken into account during updates to the AQMP and considered during the rulemaking process.

Response 8-30

See Response 8-10 regarding the emission inventory for mobile sources.

Response 8-31

CARB is the agency with authority over mobile source emissions within California. It is expected that any CARB or federal rules and regulations adopted will affect all airports or aircraft within California. If the AQMD undertakes any measures affecting specific airports, your comment will be considered.

Response 8-32

Your comments regarding capacity enhancements are noted. The details of any specific rule or regulations will be outlined in more detail at the time that the rule/regulation is promulgated.

Response 8-33

Your comments regarding vehicular emissions are noted. The details of any specific rule or regulations will be outlined in more detail at the time that the rule/regulation is promulgated.

Response 8-34

Your comments regarding the fleet vehicle rules are noted. These rules generally apply to public and private fleet operations with 15 or more vehicles. “Airports” would be regulated by these rules if they were the owners of fleet vehicles with more than 15 vehicles. Please note that additional state and federal regulatory requirements could also affect fleet vehicle owners in the future.



September 27, 2002

Michael Krause
South Coast Air Quality Management District
21865 East Copley Drive
Diamond Bar, California 91765

Subject: Comments on NOP for 2003 Air Quality Management Plan DEIR

Dear Mr. Krause:

The Ports of Long Beach and Los Angeles are pleased to submit this joint comment letter on the Notice of Preparation (NOP) for the 2003 Air Quality Management Plan (AQMP) Draft Environmental Impact Report (DEIR). While we do not have comments regarding items addressed specifically in the NOP, we do expect to have comments on the DEIR and the AQMP itself. Accordingly, it is important that the District coordinate its activities and the development of the AQMP with both Ports, particularly on those issues that may result in the regulation of the port industry. In addition, please be advised that both Ports are undertaking emissions inventories and wish to work closely with the South Coast Air Quality Management District and the California Air Resources Board. It is the Ports' sincere hope that through the coordination of crafting port-specific control strategies within the AQMP, the District will implement strategies that are feasible, cost effective, and legally defensible.

9-1

In another AQMP-related issue, we request that the District coordinate its activities with the Southern California Association of Governments in developing the State Implementation Plan (SIP). In particular, the Ports want to ensure that currently planned future cargo growth and associated port development and emissions will be included in the SIP. The development of a SIP that includes planned future port modernization will facilitate the Ports' ability to accommodate growing world trade while at the same time accounting for future emissions and satisfying future conformity requirements.

9-2

We look forward to receipt and review of the Draft EIR upon completion.

9-3

Sincerely,

Robert Kanter, Ph.D.
Director of Planning
Port of Long Beach

Ralph Appy, Ph.D.
Director of Environmental Management
Port of Los Angeles

TAJ:s

cc: Zorik Pirveysian, South Coast Air Quality Management District

COMMENT NO. 9
LETTER FROM THE PORT OF LONG BEACH

Robert Kanter
Ralph Appy
September 27, 2002

Response 9-1

The SCAQMD understands that the Port of Long Beach does not have any comments on the 2003 AQMP or the Draft EIR for the 2003 AQMP at this time. The SCAQMD will review new data provided regarding emission inventories from the ports. Also, please note that a number of the control strategies in the AQMP that will affect Port operations are proposed by CARB and SCAQMD.

Response 9-2

The 2003 AQMP has been developed in coordination with SCAG and CARB. The emission inventories for the ports are provided in Appendix III of the 2003 AQMP.

Response 9-3

The Port will be notified of the availability of the Draft EIR.

ENVIRONMENTAL AFFAIRS
DEPARTMENT

DETRICH B. ALLEN
GENERAL MANAGER
200 NORTH SPRING STREET
SUITE 2005, MAIL STOP 177
LOS ANGELES, CA 90012
(213) 978-0888

CITY OF LOS ANGELES
CALIFORNIA



JAMES K. HAHN
MAYOR

September 27, 2002

Steve Smith, Ph.D., Program Supervisor
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

Subject: Review of Notice of Preparation (NOP)/Initial Study for the Environmental Impact Report (EIR) for the 2003 Revision to the Air Quality Management Plan (AQMP)

Dear Dr. Smith:

The Environmental Affairs Department (EAD) offers the following in response to the Notice of Preparation (NOP)/Initial Study for the draft Environmental Impact Report (EIR) for the 2003 Air Quality Management Plan (AQMP). The City of Los Angeles is currently regulated by the rules of the SCAQMD and CARB and could be further affected through the additional rules proposed in the draft 2003 AQMP that become enforceable commitments in the State Implementation Plan (SIP) for California. The following comments are provided for your consideration when preparing the 2003 AQMP and the associated environmental documentation, which we will continue to review and comment on, as appropriate.

10-1

We would like to commend you on your recommendation to use light-colored roofing and road materials and tree planting, as the City finds these strategies to be beneficial. We urge you to ensure that these strategies include parking lots as well as streets, as proposed by the Air Resources Board (ARB) in the draft Clean Air Plan.

10-2

I. Project Description

Evaluation of Alternatives

The draft EIR needs to present a "reasonable range" of alternatives that meet the project objective of attainment of the air quality standards. The range of alternatives assessed should include a range of attainment strategies, with various, appropriate emission reduction targets, as well as different control methodologies. The SCAQMD should fully present alternative attainment strategies with various emission reduction targets to meet the Basin carrying capacities for the different criteria pollutants. In order for the public and decision-makers to understand the alternatives and their potential socioeconomic and environmental impacts, the draft EIR needs to present sufficient information and

10-3



Dr. Steve Smith
September 27, 2002

comparison about each of the project alternatives to allow meaningful analysis. Further, the SCAQMD should determine how it will comply with the recent action of the Governing Board on the Environmental Justice Program Enhancements for FY 2002-03 that SCAQMD CEQA assessments include a feasible project alternative with lowest air toxic emissions.

10-3
Cont'd

Control Measures

WST – 02: The draft EIR and any future rulemaking (e.g., PR 1133, PR 1133.1, PR 1133.2) need to consider and evaluate all recommendations of the Technical Advisory Committee on the assessment of composting operations and control technologies established by the Governing Board.

10-4

II. Specific Comments to the 2003 Environmental Checklist

Air Quality (Section III)

Localized impacts of air pollution, specifically related to the proposed market-based programs and other control measures, may need to be assessed. Air pollution impacts may be potentially worse for areas immediately surrounding facilities that purchase off-site credits to balance operations. Such impacts should be clearly identified, disclosed and addressed as appropriate.

10-5

Biological Resources (Section IV)

Potential biological impacts need to be assessed because, for example, the NOP states that there will be water quality and air quality impacts. Water quality impacts could potentially affect marine species, aquatic/terrestrial habitats (i.e., riparian areas), as well as terrestrial species that utilize the affected water resources, such as migratory species. Air quality impacts could have similar effects, especially since air pollution can transfer to water sources. Though it may not be feasible to address the basin-wide biological impacts of, for example, potential chemical soil stabilization in the draft EIR, it is important to assess the general impacts of chemical soil stabilization on organisms of the various trophic levels. Impacts to appropriate checklist questions in the Biological Resources section should be promoted to "Potentially Significant Impact" status in the NOP and addressed in the draft EIR.

10-6

Energy (Section VI)

Previous AQMP EIR analyses considered Rule 2015(c)(2) [Backstop Provisions, AQMP Revisions] which states that "in conjunction with the preparation of the future AQMP revisions, the Executive Officer will quantify additional energy demands, and the potential need for increased allocations resulting from implementation of the AQMP." Since energy providers are not presently subject to RECLAIM, the measures by which

10-7

Dr. Steve Smith
September 27, 2002

Page 3 of 4

secondary effects on Electrical Generating Facilities will be evaluated and ameliorated, if necessary, should be addressed.

Hydrology and Water Quality (Section IX)

Many alternative chemicals and water-based formulations which may be used to replace high VOC materials, or which may be used in reformulation of products to meet SCAQMD regulatory requirements, may pose a potential threat to water quality, requiring specific mitigations. Proposed control strategies and alternative chemical use should be investigated for similar impacts and appropriate mitigation measures.

The City operates wastewater treatment plants that must meet stringent water quality standards, as well as air quality standards. For example, the City is regulated by NPDES permits, the California Ocean Plan, the Inland Surface Water Plan, the Santa Monica Bay Restoration Project, and Total Maximum Daily Load (TMDL) regulations. Proposed AQMP control measures must also be assessed for consistency with these and other resource plans and policies.

Additionally, the secondary effects from BCM-07 (Further PM10 Reductions From Fugitive Dust Sources) must be considered in the draft EIR. Increases in impermeable surfaces affect stormwater runoff and chemical composition, and this would affect both local governments and water quality.

Land Use and Planning (Section X)

The strategies in the Draft AQMP have the potential to conflict with applicable land use plans, policy or regulations, including the City of Los Angeles General Plan and local community and specific plans. This potential impact needs to be evaluated in the draft EIR and mitigated, as required.

Public Services (Section XIV)

As outlined in the Air Quality and Hazards and Hazardous Materials sections of the NOP/Initial Study, the AQMP may result in potential human health risks and increased air toxics. These impacts would directly affect fire services and fire fighting training needs and programs, as well as training needs of police/highway patrol agencies in order to be able to respond to more hazards and more toxic situations. Specific mitigations should be identified in the draft EIR to reduce risks and minimize or avoid impacts to emergency services and associated local government impacts.

Additionally, impacts to emergency services from the mobile source reduction strategies should be addressed in the draft EIR. Some of the reduction strategies could affect emergency response time through reduced performance, and thus an alternative including an exemption for emergency vehicles should be considered and evaluated, if necessary in the EIR.

Dr. Steve Smith
September 27, 2002

Page 4 of 4

COMMENT NO. 10
LETTER FROM THE CITY OF LOS ANGELES

Gretchen Hardison
September 27, 2002

Response 10-1

The SCAQMD understands that the City of Los Angeles is regulated by CARB and the SCAQMD and could be affected by additional regulations through the 2003 AQMP.

Response 10-2

The 2003 AQMP includes MSC-01, which would include the use of light colored roofing and road materials, and tree planting programs (see 2003 AQMP, Appendix IV-A, pages 42-47. As currently envisioned, the use of lighter colored pavement materials would include a number of urban surfaces including streets, sidewalks, parking lots, school yards, and other similar surfaces.

Response 10-3

The alternatives analysis is presented in Chapter 5 of the 2003 AQMP EIR. A lowest air toxic emission alternative has been included. The 2003 AQMP is designed to show compliance with and federal ambient air quality standards. The environmental justice program enhancements, therefore, are not part of the 2003 AQMP. However, the AQMP will result in overall emission reductions resulting in beneficial impacts to all residents in the Basin.

Response 10-4

Your comment is noted and the available information from PR1133, 1133.1, and 1133.2 has been included in the Draft EIR. Future rulemaking will consider all public comments received, including those of the Technical Advisory Committee.

Response 10-5

The AQMP identifies control measures to reduce air emissions from existing emission sources. No new emission credit trading programs are currently being proposed in the AQMP. However, the rules that implement existing emission credit trading programs place restrictions on the locations that emission trades can be made and place restrictions on the types of pollutants that can be traded to avoid impacting areas surrounding facilities that use off-sets. Existing rules also require ambient air quality analyses to assure that new equipment does not exceed ambient air quality standards for pollutants already in compliance with air quality standards.

Response 10-6

The potential impacts of implementing control measures in the 2003 AQMP water quality are addressed in Chapter 4.4 - Hydrology and Water Quality. Implementation of the control

measures in the AQMP are expected to result in a decrease in emissions from a variety of sources in the Basin and decrease the potential for transferring air pollutants into other environmental media. Therefore, no significant impact on biological resources is expected. See Chapter 4.2 of the EIR for a discussion of the air quality benefits associated with implementation of the 2003 AQMP.

Response 10-7

Energy impacts associated with implementing the control measures in the 2003 AQMP are discussed in Chapter 4.2 – Energy of the AQMP EIR. The potential increase in air emission from electric generating facilities is addressed in Chapter 4.1 – Air Quality of the AQMP EIR.

Response 10-8

The potential water quality impacts associated with reformulated coatings, solvents and consumer products are addressed in Chapter 4.4 - Hydrology/Water Quality of the AQMP EIR.

Response 10-9

The potential impacts of the 2003 AQMP control measures on wastewater treatment plants are discussed in Chapter 4.4 – Hydrology/Water Quality of the AQMP EIR.

Response 10-10

The potential impacts of the 2003 AQMP control measures on water quality are discussed in Chapter 4.4 – Hydrology/Water Quality of the AQMP EIR.

Response 10-11

No conflicts with land use plans, policy or regulations were identified during the evaluation of the potential impacts associated with implementation of the AQMP (see Appendix A for the EIR). Further, the commentator does not cite any specific potential conflicts between the 2003 AQMP and any land use plans. Therefore, no specific conflicts with any land use plan have been identified.

Response 10-12

Implementation of the AQMP is expected to result in an overall decrease in the use of toxic chemicals and a related decrease in associated emissions and human health impacts. The hazard impacts associated with implementation of the 2003 AQMP are addressed in Chapter 4.3 – Hazards of the EIR.

Response 10-13

Implementation of the control measures in the AQMP is expected to result in a decrease in congestion and vehicle miles traveled, thus theoretically reducing the response times of

emergency vehicles. Implementation of the some mobile source control strategies could result in a reduction in energy efficiency of petroleum based fuels. The potential energy impacts associated with these control measures are discussed in Chapter 4.3 – Energy of the AQMP EIR.

Response 10-14

No significant impacts associated with implementation of the 2003 AQMP on public services were identified. (See AQMP EIR Appendix A). However, the impacts associated with the AQMP on water and wastewater were addressed in Chapter 4.4 – Hydrology/Water Quality of the AQMP EIR. The potential energy impacts associated with 2003 AQMP on electricity generators, natural gas suppliers, petroleum supplies, and the use of alternative fuels were discussed in Chapter 4.2 – Energy of the 2003 AQMP EIR. Typically the rulemaking process considers exemptions for emergency services where needed. For example, the statute authorizing fleet rules requires fuel exemptions unless it is determined no alternative fuels are sufficiently viable not to affect fuel services.

Response 10-15

The potential impacts due to implementation of the control measures in the 2003 AQMP on water quality were addressed in Chapter 4.4 – Hydrology/Water Quality of the Draft EIR.

Response 10-16

The potential impacts from implementation of the 2003 AQMP on solid and hazardous wastes are addressed in Chapter 4.5 – Solid/Hazardous Waste of the AQMP EIR, including the impact on state waste reduction requirements.

Response 10-17

The comments on the AQMP Draft EIR are noted.



CITY OF ANAHEIM, CALIFORNIA

Planning Department

September 27, 2002

Steve Smith (c/o CEQA)
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE 2002 AIR QUALITY MANAGEMENT PLAN (AQMP)

Dear Mr. Smith:

Thank you for the opportunity to review the above-referenced document. City staff has reviewed the document and has no comments at this time.

Please forward any subsequent public notices and/or environmental documents regarding this project to my attention at the address listed below.

If you have any questions regarding this response, please do not hesitate to contact me at (714) 765-5139, Extension 5750.

11-1

Sincerely,

Joseph W. Wright
Associate Planner



**COMMENT NO. 11
LETTER FROM THE CITY OF ANAHEIM**

Joseph W. Wright
September 27, 2002

Response 11-1

The SCAQMD understands that the City of Anaheim wishes to be notified of all public notices and documents regarding the 2003 AQMP Draft EIR.

Kathy Stevens

From: Baker, Roger [RBaker@ci.burbank.ca.us]
Sent: Friday, September 27, 2002 10:14 AM
To: CEQA_Admin
Cc: Bashmakian, Art
Subject: NOP for DEIR for 2003 Air Quality Plan

Mr. Michael Krause:

The City of Burbank received a copy of the NOP for the DEIR for the 2003 Air Quality Plan. We down loaded copies of the attached documents, and circulated those documents for City Department review. We received only one comment, and that is from our City Engineer in the Public Works Department.

The City Engineer, Bonnie Teaford, acknowledged that her initial concerns with regards to the emissions from architectural coatings will be addressed in the EIR, however, she did have two specific questions with regards to the proposed use of cool roofs and cool pavements. Her first question is with regard to glare, and would the requirement for cool roofs and pavements increase glare? Her second question is regarding cool pavement, and would this requirement decrease the use of rubberized asphalt, thus decreasing the recycling of this material, and an increase in solid waste disposal.

Thank you for including the City of Burbank in the NOP process. If you have any questions with regards to our comments, please contact me either via e-mail, or by phone (818) 238-5278.

Roger Baker
Deputy City Planner

12-1

COMMENT NO. 12
E-MAIL FROM THE CITY OF BURBANK

Roger Baker
September 27, 2002

Response 12-1

The control measure to reduce the heat associated with paved surfaces is not expected to be composed of reflective materials that could cause light and glare impacts. Details on the types of materials that would be used have not yet been determined. Also note that this control measure would also reduce heat by increasing the shade by planting more trees.

COMMENT NO. 12
E-MAIL FROM THE CITY OF BURBANK

Roger Baker
September 27, 2002

Response 12-1

The control measure to reduce the heat associated with paved surfaces is not expected to be composed of reflective materials that could cause light and glare impacts. Details on the types of materials that would be used have not yet been determined. Also note that this control measure would also reduce heat by increasing the shade by planting more trees.



Mayor
Richard T. Dixon

Mayor Pro Tem
Peter Herzog

Council Members
Kathryn McCullough
Marcia Rudolph
Helen Wilson

City Manager
Robert C. Dunek

September 19, 2002

Mr. Michael Krause
c/o CEQA
SCAQMD
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

13-1

SUBJECT: Draft EIR for 2003 Air Quality Management Plan

Dear Mr. Krause:

The City of Lake Forest has received the Notice of Preparation for the above subject project. At this time the City does not have comments. We would like to continue to receive information and documents on the project. Please send all further correspondence to myself, Ms. Gayle Ackerman, AICP, Director of Development Services at 23161 Lake Center Drive, Suite 100, Lake Forest, CA 92630.

Sincerely,
CITY OF LAKE FOREST

Gayle Ackerman, AICP
Director of Development Services

CC: Interjurisdictional File



**COMMENT NO. 13
LETTER FROM THE CITY OF LAKE FOREST**

Gayle Ackerman
September 19, 2002

Response 13-1

The SCAQMD understands that the City of Lake Forest has no comments at this time but wishes to be notified of all public notices and documents regarding the 2003 AQMP Draft EIR.



CITY OF ORANGE

DEPARTMENT OF COMMUNITY DEVELOPMENT

FAX (714) 744-7222

ADMINISTRATION
(714) 744-7240

PLANNING DIVISION
(714) 744-7220

BUILDING DIVISION
(714) 744-7200

September 19, 2002

#27-02

Mr. Michael Krause
South Coast Air Quality Management District
21865 East Copley Drive
Diamond Bar, CA 91765

Dear Mr. Krause,

**Subject: Notice of Preparation of a Draft Environmental Impact Report for the
Proposed 2003 Air Quality Management Plan**

The City of Orange (City) appreciates the opportunity to comment on the above referenced Notice of Preparation. The project consists of the preparation of the 2003 Air Quality Management Plan, which will update the 1997 Air Quality Management Plan (as amended in 1999).

The City has reviewed the NOP and has no specific comments at this time. The City would appreciate being notified of all public hearings related to this project and looks forward to reviewing the Draft EIR upon its completion. If you have any questions, please contact me at (714) 744-7220.

14-1

Sincerely,

Jennifer McDonald
Environmental Review Coordinator
Community Development Department

COMMENT NO. 14
LETTER FROM THE CITY OF ORANGE

Jennifer McDonald
September 19, 2002

Response 14-1

The SCAQMD understands that the City of Orange has no comments at this time but wishes to be notified of all public notices and documents regarding the 2003 AQMP Draft EIR.

11
5308 Stonewood Dr.
Riverside, CA 92506
11 Sept. 2002

Subject: Draft Environmental Impact Report, dated August 2002
To: Mr. Michael Krause, C/O CEQA
From: Don Blose, Air Lung Assn of Inland Counties,
Air Quality Committee

Dear Michael,

In General, the Draft Environmental Impact Report appears to be a thorough review of applicable impacts, with more detailed comments on areas of potential conflict.

15-1

I was happy to see a reference to the new Fine particulant standards (p. 1-15)

The problem of commercial facilities, like truck terminals, located next to residential (and school and recreation) areas is certainly the case in Mira Loma and other locations. (pages 2-3 and 2-4)

15-2

Item II a)-c) on replacement of agricultural areas should be clarified (p. 2-4)

It would be interesting to see the health trade-off between VOC vs NOx and NOx vs PM-10 for evaluation by the Lung Association and others as a guide to evaluation of particulant filters and of diesel vs CNG engines for heavy duty trucks. (see page 2-6)

15-3

[2]

The potential hazards from catalytic reductions will be interesting in your future evaluations. (see p. 2-16.)

See ~~IX~~, l), m) and o) on page 2-21. In addition or in place of water, certain chemicals are sometimes used to stabilize dirt during road work or farming. These chemicals should be considered.

See ~~XI~~ a), b) on page 2-23. The materials in catalytic converters (current and future) should be considered.

See ~~XVIII~~ b) on page 2-32. This statement is not clear!

The Measures by other agencies starting on page A-1 are really significant. The value of the AQMP would be greatly enhanced if the items under control of ARB, etc could be prioritized or even be assigned requested dates, which would then be reviewed by those agencies for potential start and effective dates. The whole matter of planning would become more realistic, thereby.

[Note: my back ground is a M.S. degree from Ohio State University and 45 years as a systems engineer in the aerospace industry.]

Yours truly,
D. R. O

(909) 681-9001

COMMENT NO. 15
LETTER FROM THE AMERICAN LUNG ASSOCIATION

Don Blose
September 11, 2002

Response 15-1

Your comments regarding the Draft EIR are noted.

Response 15-2

The 2003 AQMP provides an initial evaluation of compliance with the federal PM_{2.5} standards.

The 2003 AQMP is a guidance document that establishes an overall control strategy to meet federal and state ambient air quality standards. The AQMP does not regulate land uses.

Implementation of the 2003 AQMP is not expected to result in the conversion of agricultural land uses to other uses.

Response 15-3

CARB reviews the emission increases and decreases associated with control equipment as part of its certification process. Part of its certification process is to determine that the control equipment provides emission benefits without resulting in significant increases in other pollutants.

Response 15-4

See Chapter 4.3 – Hazards/Hazardous Materials of the EIR for a discussion of the hazard impacts associated with the 2003 AQMP.

Response 15-5

The potential impacts on water quality due to the use of dust suppressants are addressed in Chapter 4.4 - Hydrology/Water Quality of the EIR.

Response 15-6

The potential impacts of the use of catalytic converters have been addressed in Chapter 4.5 - Solid/Hazardous Waste of the EIR.

Response 15-7

The statement indicates that cumulative impacts associated with the 2003 AQMP are potentially significant and will be addressed in the 2003 AQMP EIR (see Chapter 4).

Response 15-8

Chapter 2 of the EIR provides the dates by which other agencies have committed to implement the various identified control measures.



**Pacific Maritime Association
Headquarters**

September 27, 2002

Mr Steve Smith, Ph.D
Program Supervisor
Planning Rules and Area Sources
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

Subject: Notice of Preparation of a Draft EIR : 2003 Air Quality Management Plan

Dear Mr. Smith:

Pacific Maritime Association (PMA) is an association of ship owners, marine terminal operators, and stevedore companies of the West Coast. It has 90 members with 65 conducting business in California. PMA members operate all of the major marine cargo terminals in Southern California. Last year Association members in West Coast ports handled more than 50 percent of the U.S. containerized cargo with a value of more than \$385 billion. California ports handled over 75 percent of that volume.

We only became aware of this document informally as of this date. We reserve comment at an appropriate time as regulations or plans proceed to the proposal and requirement stage.

We are impacted by any planning or actions that you might take with respect to:

- Off-Road - Compression Ignition Engines
- Off Road - Large Spark Ignition Engines
- Commercial Marine Vessels and Ports

We would like to be directly informed of all plans, actions, or reports related to the specific topics noted above as they relate to marine terminal and vessel operations

Sincerely,

E-mailed 9-27-02 Original mailed 9-30-02

Marc MacDonald
Vice President Accident Prevention

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16-1

16-2

COMMENT NO. 16
LETTER FROM THE PACIFIC MARITIME ASSOCIATION

Marc MacDonald
September 27, 2002

Response 16-1

The SCAQMD understands that your association could be impacted by certain control measures in the 2003 AQMP.

Response 16-2

The SCAQMD understands that the Pacific Maritime Association wishes to be notified of all public notices and documents regarding the 2003 AQMP Draft EIR.