South Coast
Air Quality Management District
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Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Proposed Apple Auto Dismantling Project (CUP No. 11-16, GP Amendment No. 11-05)

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document. AQMD did not receive the MND for this project from the lead agency, contrary to CEQA Guidelines 15073. We received notice of this project from a third party on August 9, 2012, and are therefore providing this comment letter after the end of the official comment period. We have received other project CEQA documents, and have worked cooperatively with the lead agency in the past and we look forward to receiving all future CEQA documents for projects that have the potential to impact air quality.

In the project description, the lead agency proposes the construction of an automobile and salvage operation in two phases on two parcels on a total 10.23 acre site. Phase I would occur on the east side of the property on Parcel A, a 6.25 acre site. Construction during Phase I would include a 7,500 square foot building for office, retail and automobile servicing uses. Development will also include construction of a 2,500 square foot shed structure to cover storage, a detention basin, and open storage for approximately 420 automobiles. Phase II would occur on the west side of the property on Parcel B, a 3.98 acre site. During Phase II, an additional 7,500 square feet of building space would be constructed plus another 2,500 square foot shed structure would be built for covered storage. Additional outdoor storage would be provided for 408 automobiles. Construction for the entire site would also include 37 parking spaces with 41,650 square feet of paving. Construction of Phase I would occur in mid-2013 and is expected to last six months. Phase II construction is tentatively planned to begin in 2019. Operations are proposed to occur Monday through Saturday from 7:00 am to 5:00 pm and will require approximately 20 employees.

In the air quality analysis, the lead agency evaluated the proposed project's regional short-term air quality impacts and compared those estimates with the AQMD recommended regional daily significance thresholds. In addition to evaluating the above-mentioned air quality impacts, the AQMD recommends that the lead agency also compare the construction impacts estimated in the modeling to the AQMD recommended localized thresholds of significance to ensure that any nearby sensitive receptors are not adversely affected by the

construction activities that are occurring in close proximity. It is noted on page three under surrounding land uses and in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (residential properties) north, south and east of the proposed project. The AQMD staff further recommends that all operational impacts be estimated from all equipment sources and compared with both regional and localized thresholds. AQMD guidance for performing a localized air quality analysis can be found on the AQMD web page.[1] Should the lead agency conclude after its analyses that construction or operational localized air quality impacts exceed the AQMD daily significance thresholds, staff has included mitigation measures in an attachment in addition to those measures listed by the lead agency starting on page 20 of the Draft IS/MND.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

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IM:GM

SBC120810-01
Control Number

[1] http://www.aqmd.gov/ceqa/handbook/LST/LST.html

Air Quality Analysis - Construction

1. In the air quality analysis, the lead agency estimated project construction air quality impacts using the CalEEMod land use model. This model uses default and user-defined settings to estimate emissions based on the expected land use. Based on User Entered Comments and review of the inputs to the model's off-road equipment list, the lead agency has modified the default settings for the load factor listed for the types of off-road equipment selected reducing each default load factor by a factor of about one third, effectively lowering the emissions calculated from these emission sources by one third. For example, the CalEEMod default load factor for a rubber tired dozer is 0.59; a tractor/loaders/backhoe has a load factor of 0.55; and an excavator is 0.57. In the air quality analysis, the lead agency used 0.40 as a load factor for rubber tired dozer; a load factor of 0.37 for a tractor/loaders/backhoe; and 0.38 for an excavator. These edits to load factors are not recommended by the AQMD staff without substantial evidence to support their use. If the lead agency would like to take credit for recent ARB Rulemaking, the newer OFFROAD 2011 model should be used[2]. Otherwise, the lead agency should commit to enforcing the assumed lower emission factors or use the default load factors provided in CalEEMod.

Air Quality Analysis - Operations

2. In the air quality analysis, the lead agency estimated construction air quality impacts using the CalEEMod land use model. Although the lead agency modeled some operational emissions using CalEEMod, the Draft MND did not estimate the automobile and salvage facility operational air quality impacts from all emissions sources. All off- and on-site diesel equipment including forklifts, cranes, delivery trucks, etc., should be evaluated. In addition, it is not clear how many vehicles will be processed (crushed) or the potential peak rate of daily throughput. In the Final MND, the lead agency should include the regional and localized criteria pollutant operational impact estimates and include the supporting documentation: emission factors, formulas, methodologies, etc. These emission estimates should then be compared to the AQMD recommended regional and localized thresholds of significance to determine whether long-term project impacts from the project's operations will result in significant air quality impacts.

Construction Mitigation Measures

3. Should the lead agency determine that the proposed project will exceed recommended CEQA construction significance thresholds, the AQMD staff recommends that the

[2] OFFROAD 2011 shows that additional parameters affect emissions besides load factor, and that some equipment-specific emission factors can be either higher or lower than the OFFROAD 2007 emission factors used in CalEEMod. The new version of CalEEMod that incorporates ARB's OFFROAD 2011 is due out Fall 2012.

lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.

- Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles) have used, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:

  - ✓ Project start, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
  - ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: http://www.aqmd.gov/tao/Implementation/SOONProgram.htm .

- Limit the amounts of daily soil disturbance to the amounts analyzed in the Draft CEQA document.
- Prohibit truck idling in excess of five minutes, on- and off-site.
- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
- Vehicles engines should be kept tuned according to manufacturer's specifications.

- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable;
- Reroute construction trucks away from congested streets or sensitive receptor areas.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .