



South Coast Air Quality Management District

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

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Mr. Robert Delgadillo, Interim Director, rdelgadillo@comptoncity.org
Planning and Economic Development
Planning Division
City of Compton
205 S. Willowbrook Avenue
Compton, CA 90220

Draft Mitigated Negative Declaration (Draft MND) for the Proposed Republic Materials Recycling Facility (CUP No. 2726)

The South Coast Air Quality Management District (SCAQMD) 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.

In the project description, the lead agency proposes construction on a 2.32-acre site that would modify an existing 88,000 square foot industrial manufacturing/warehouse building into a new Materials Recycling Facility (MRF) with a capacity of 1,200 tons per day. The MRF would handle cardboard, mixed paper, small scrap metal, plastic, aluminum, steel and wood. The facility would operate 24-hours per day with three shifts, with the third shift used for maintenance. The proposed facility would employ approximately 150 employees during each of the two operational shifts. Construction would include expansion of the main building by 10,000 square feet, raising the height of the roof up to 10 feet for approximately 11,000 square feet of the existing building, building a 6,000 square foot office building/employee center, reconstruction of the rear loading dock area and other activities. and generate approximately 500 new trips to the new facility including 374 collection truck trips, 32 transfer truck trips and 94 box trailer trips. Parking would increase from 227 to 240 spaces with the rear trailer parking area reconfigured to have temporary parking for up to 60 container trailers that are potentially destined for shipment to the Port of Los Angeles.

In the air quality analysis, the lead agency supports its determination that operational air quality impacts are less than significant using a displaced truck trip argument. This argument presumes “that all trips attributed to project development are new trips unless it can be reasonably demonstrated that such trips are derived from elsewhere. There may be some circumstances where a proposed project might decrease vehicle trips and/or vehicle miles, or not result in an increase to the extent assumed when using standardized trip generation figures”, but “any such analysis in an environmental document should not be based on speculative information. Substantive data based on information from sources

such as site-specific and market studies needs to be available to agencies reviewing the environmental documentation to substantiate that trips attributed to the project are either not new trips or that the number or length of trips are less than that expected when using standardized trip information.”¹

Although the lead agency has provided a baseline analysis for the previous use (industrial, manufacturing, warehouse), the proposed new use has entirely different characteristics including the number of trips, vehicle miles traveled, and destinations for the waste input sources and their ultimate destinations. Without further substantial information demonstrating that any trips associated with the project will not be new trips, it is not clear that the Draft MND’s determination of a less than significant impact is justified. Because this project approval does not place any limits on any other facilities, the lead agency cannot conclusively determine that this new facility does not add capacity to the system. This additional capacity has the potential to impact the environment, therefore it must be considered in the significance determination. As operational regional emissions for NO_x (146 pounds per day) are demonstrably above the recommended SCAQMD CEQA significance threshold of 55 pounds per day, the lead agency should reconsider its determination and provide additional mitigation to reduce these emissions.² If emission estimates remain significant, mitigation is required. In particular, cleaner burning trucks, such as those that meet 2010 emission standards and/or alternative fueled trucks, have been used for other similar projects to substantially reduce operational emissions.

Further, the lead agency estimated construction and operational air quality impacts using the land use emissions model California Emissions Estimator Model (CalEEMod) using a 1.5 daily vehicle trip rate from the Institute of Traffic Engineers Trip Generation Manual (ITE) (General Heavy Industry land use per 1,000 square feet). Starting on page 81 in the Transportation/Traffic Section of the Draft MND, however, a different number of overall daily vehicle trips for the proposed project is described in the narration. Although the 1.5 daily vehicle trip rate used in the modeling resulted in the CalEEMod output sheets showing 719 total daily vehicle trips, of which 440 are truck trips, the narration in the Transportation/Traffic Section shows 830 overall daily trips including 500 daily truck trips and 330 daily passenger trips. Based on these different figures, the lead agency should revise the Final MND and reconcile the discrepancies in these numbers including in any applicable air quality analysis so that the number of daily vehicle trips is consistent throughout the CEQA document.

Finally, the lead agency has included natural gas and diesel emission factors shown in Table 4-5 of the Air Quality Impact Analysis and Air Toxics Risk Assessment (SCS Engineers, February 2013) that do not appear in the CalEEMod computer modeling input files. The Final CEQA document should be revised to reflect the appropriate natural gas and diesel emission factors associated with the emission sources listed in Table 4-5 throughout the Final MND including applicable analyses.

¹ Page 9-8 of SCAQMD CEQA Air Quality Analysis Handbook

² Additional measures can be found at the SCAQMD website:
http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

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Interim Director

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

Sincerely,



Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:GM

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