



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Prologis – Dominguez Tech Center

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 to demolish the existing structures and construct two buildings for warehouse distribution and office space uses totaling approximately 443,020 square feet on a 6.14 acre site. The lead agency has projected 1,577 total daily vehicle trips including at least 322 daily truck trips operating at the site. In the Air Quality Section, the lead agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. Based on its analyses, the lead agency has determined that construction and operational air quality impacts are not significant.

The SCAQMD staff has concerns regarding the air quality assumptions used in the construction and operational portion of the Air Quality Analysis Report. It is unclear how the lead agency determined the construction and operational emissions. Details are included in the attachment.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the lead agency to address these issues and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist CEQA Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

Attachment

JW:JC

LAC160112-06

Control Number

Attachment

General Comments

1. The Air Quality Analysis provides the CalEEMod annual summary and does not include any summer or winter reports. Without the summer or winter reports, SCAQMD staff was unable to verify the maximum daily emissions provided in MND. SCAQMD staff recommends providing all CalEEMod reports.
2. Since the project includes demolition, the lead agency must comply with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Please provide additional information regarding compliance with SCAQMD Rule 1403 in the Final MND.

Air Quality Analysis - Operations

3. Based on a review of the project's emissions calculations in Air Quality Analysis CaEEMod Input Parameters, the lead agency determined the proposed Project's air quality impacts using emission factors for unrefrigerated warehouses/truck activity. Since the future tenant is unknown, SCAQMD staff recommends that the lead agency include a mitigation measure that precludes the use of refrigerated warehousing at the Project site or revise the air quality analysis to account for emissions from refrigerated warehouse uses.

Health Risk Assessment (HRA) and Localized Significance Threshold (LST) Analysis

4. The lead agency used the FASTALL option when performing their AERMOD model. Please note that when using AERMOD, the regulatory default option should be used (i.e. without the use of the "FASTALL" or "FLAT" options). If the lead agency wishes to use the FASTALL option or any other regulatory non-default options, SCAQMD staff should be consulted prior to the start of modeling.
5. SLINE1 and SLINE2 onsite travel line volume sources do not span the entire docking area. SCAQMD staff recommends that the lead agency revise the HRA using a series of volume sources that spans the entire docking area to ensure that impacts are properly analyzed.
6. STCK1 and STCK2 onsite idling point sources should span the entire docking area. SCAQMD staff recommends that the lead agency revise the HRA using a line volume that spans the entire docking area to ensure that impacts are properly analyzed.