South Coast
Air Quality Management District
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FAXED: APRIL 24, 2007 April 24, 2007

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Draft Mitigated Declaration (Draft MND) for the Proposed Design Overlay Review No. 964-06 (100,000 Square Foot Industrial/Warehouse Building) in the City of Carson

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 Mitigated Negative Declaration (Final MND).

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Mitigated Negative Declaration. The SCAQMD staff would be happy 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,

Susan Nakamura
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC070404-02
Control Number

Construction and Operational Air Quality Impacts

Section III Air Quality (Pages 5-7)

1. In the Draft Negative Mitigated Declaration's (Draft MND) project description, the lead agency proposes the construction of a 100,000 square foot industrial building for the purpose of warehouse use on 3.63 acres. The SCAQMD recommends that the lead agency quantify the proposed project's construction air quality impacts, e.g., on- and off-road equipment, architectural coating, asphalt paving or employee work trip emissions and the proposed project's operation air quality impacts, and that the project air quality impacts be included in the Final MND. Because this information has not been included in the Draft MND, the lead agency has therefore not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act.

   The environmental document should contain sufficient detail to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Therefore, the SCAQMD requests that the lead agency recirculate the Draft MND pursuant to CEQA Guidelines §15073.5 and include sufficient information on all components of the proposed project and quantify the emission estimates, emissions factors, methodologies, control efficiencies for any proposed mitigation measures, and identify significance thresholds for the proposed project. This information could be included in the final document as part of the narration or as an appendix.

   To calculate the proposed project's emission impacts, the lead agency can utilize the current URBEMIS 2002 land use emissions model, which can be accessed at http://www.aqmd.gov/ceqa/models.html or follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook. If impacts are concluded to be significant, the lead agency should also identify any mitigation measures needed along with their associated control efficiencies, if known, for construction and operational activities for the proposed project and quantify the effects any mitigation measures will have on significant air quality impacts.

PM2.5 Significance Thresholds

2. In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. When preparing the air quality analysis for the proposed project, it is recommended that the

lead agency perform a PM2.5 significance analysis by following the guidance found at http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Localized Significance Thresholds

3. Because the proposed site is located approximately a quarter-mile from an existing mobile home park residential use, a localized air quality analysis may be warranted to ensure that the residents in the existing mobile home park site are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: http://www.aqmd.gov/ceqa/handbook/LST/LST.html .

CO Hotspots Analysis

4. In the Traffic/Traffic Section on pages 18-20, the lead agency discusses transportation impacts that are expected to generate approximately 500 trips per day for the proposed warehouse usage with 45 trips occurring during the morning peak hour and 47 trips generated during the afternoon peak hour but does not disclose potential project traffic impacts for intersections potentially affected by the proposed project. The lead agency concludes that impacts will be Less than significant/No impact but does not provide even a summary of a current traffic study to support that finding. For the purposes of evaluating the proposed project's traffic impacts for CO hotspots analysis, the lead agency should at minimum include the following in the final CEQA document to demonstrate that the potential for CO hotspots is less than significant. The lead agency should identify the intersection(s) that would be affected by the proposed project; quantify the level of service and volume to capacity effects of the proposed project. Quantifying existing traffic volumes, the proposed traffic impacts and the impacts from any proposed mitigation measures are important because the results may warrant performing a CO hotspots analysis. The SCAQMD recommends that a CO hotspots analysis be performed if a project results in increasing congestion whereby the LOS of an intersection is changed from C to D or if there is a two-percent increase in the volume to capacity ratio of any intersection rated D or worse.

   Should the lead agency, after estimating the proposed project's traffic impacts, believe that a CO hotspots analysis is warranted, please refer to the most current Cal Trans guidance regarding performing a CO hotspots analysis. This information can be obtained at the following internet address:
   http://www.dot.ca.gov/hq/env/air/coprot/htm

Cancer Risk Assessment

5. The California Air Resources Board has designated diesel particulate emissions as a toxic air contaminant. The SCAQMD recommends that the lead agency evaluate the associated cancer risks from the diesel particulate emissions for projects uses that involve potential exposure from diesel truck particulate emissions, e.g., industrial/warehouse uses, to existing sensitive receptor(s) located less than one-quarter of a mile from a new site.

   The SCAQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions. This document can be used to perform a health risk assessment based on the characteristics currently known for the project. This document can be downloaded from AQMD's CEQA web pages at the following URL:
   http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc .

   The HRA Guidance document also contains a list of mitigation measures that are specifically recommended to be used to mitigate diesel exhaust emissions, if applicable and feasible.

Construction Mitigation Measures

6. Should the lead agency's estimates of volatile organic compounds (VOC) emission impacts from construction activities from architectural coatings off-gas prove to be significant (see comment #1), the SCAQMD recommends that the lead agency consider the following mitigation measures, if feasible:

   Recommended Additions:

   1. Contractors shall use high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50% or other application techniques with equivalent or higher transfer efficiency.
   2. Use required coatings and solvents with a VOC content lower than required under Rule 1113.
   3. Construct/build with materials that do not require painting
   4. Use pre-painted construction materials.