



**South Coast
Air Quality Management District**
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:
eibanez@ci.azusa.ca.us

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Mr. Edson Ibanez, Assistant Planner
City of Azusa
213 E. Foothill Blvd.
Azusa, CA 91702

**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Proposed
CT Aerojet Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. In the project description, the Lead Agency proposes to construct three warehouses totaling 181,800 square feet. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final IS/MND.

The SCAQMD staff has concerns regarding the assumptions used in the air quality analysis, specifically the vehicle trip rates and trip lengths. In Table 8 – Operational Vehicle Trip Assumption and CalEEMod output sheets provided in Appendix A of the MND appendices, the modeling used a 40 mile one-way trip distance and a 19.7% trip percentage for trucks moving goods for perspective tenants (C-W) and a 6.9 one-way trip distance and an 80.3% trip percentage for trucks supporting the operation of the perspective tenants (C-NW). According to section 4.4.1 Vehicle Trips of the CalEEMod User's Guide, commercial-customer (C-C) and commercial-work (C-W) are defined as work related trips. Commercial-nonwork (C-NW) is reserved for activities such as non-work related delivery trips.¹ A 40 mile one-way trip distance and 80.3% trip percentage should be used to model trucks moving goods for the perspective tenants (C-W) and a 6.9 one-way trip distance and 19.7% trip percentage should be used by trucks supporting the operations of the proposed facility(C-NW). The air quality impacts should be re-analyzed using the appropriate trip rates and lengths to avoid under-estimating the air quality impacts from the project.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final IS/MND associated with this project.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

JW:JC
LAC150814-05
Control Number

¹ www.caleemod.com