



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Draft Environmental Impact Report (EIR) for the
Prologis Del Amo and Prairie Center Project (Proposed Project)
(SCH No: 2025040130)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Torrance is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments, which are organized by topic of concern.

Summary of Proposed Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of developing a 403,033 square feet (sf) warehouse building with up to 10 percent cold storage on a 31.2-acre site and 7.79 acres of offsite road improvements.¹ The Proposed Project is bounded by Madrona/Pairie Avenue to the west, Del Amo Boulevard to the south, and railroad tracks from northwest to southwest.² The Proposed Project would include 56 dock doors³ on the northeastern portion of the building and there are 100 daily truck trips associated with the operation.⁴ Based on the review of an aerial photograph, the nearest sensitive receptors (e.g., residences) are approximately 200 feet southwest of the Proposed Project site. Construction is anticipated to occur in one phase and take approximately 35 months to complete.⁵

South Coast AQMD Comments

Insufficient Dispersion Modeling and Receptor Coverage

The current localized analysis appears to rely on South Coast AQMD's Localized Significance Threshold (LST) screening methodology, which is typically intended for project-level assessments with defined site layouts, emission sources, and operational characteristics for sites less than five acres.

¹ Draft EIR, p. 2-2.

² *Ibid.* p. 2-1.

³ *Ibid.* p. 2-2.

⁴ *Ibid.* p. 4.8-7.

⁵ *Ibid.* p. 2-9.

Appendix D (Air Quality Impact Analysis) indicates that dispersion modeling AERMOD was used to evaluate onsite nitrogen oxide (NO_x), carbon monoxide (CO), and particulate matter (PM₁₀ and PM_{2.5}) impacts during project construction and operation.⁶ However, the modeling includes 68 receptors. This limited receptor network is not sufficient to identify the maximum ground-level concentrations (GLCs) and may underestimate localized air quality impacts from the project.

Under South Coast AQMD's Air Quality Modeling Guidance,⁷ when AERMOD is used to assess criteria pollutant impacts:

- A uniform Cartesian receptor grid with spacing of 100 meters or less must be used for all distances within 1 kilometer of the source
- Discrete receptors must be placed along the ambient air boundary (e.g., property or fence line boundary) following maximum spacing requirements
- Receptor placement must be sufficient to capture maximum concentration gradients and potential impacts to surrounding sensitive receptors

In addition, the modeled GLCs must be combined with appropriate background concentrations and compared to the applicable Ambient Air Quality Standards (AAQS) to determine whether the project would exceed the AAQS.

Therefore, to ensure the analysis complies with South Coast AQMD modeling guidance and CEQA requirements, the Lead Agency is recommended to revise the EIR to:

- Follow the South Coast AQMD's Modeling Guidance for receptor placement and grid spacing
- Expand and justify the receptor network to ensure the maximum GLCs are captured
- Incorporate background concentrations and compare total concentrations to the applicable AAQS
- Present full dispersion results for all receptor locations
- Disclose the revision in the Final EIR

Additional Recommended Air Quality and Greenhouse Gases Mitigation Measures and Project Design Considerations

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

Mobile Sources

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NO_x

⁶ Appendix D – Air Quality Impact Analysis. p. 48.

⁷ South Coast AQMD Modeling Guidance for AERMOD: <https://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance#Receptor>

emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

Note: Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act⁸
2. South Coast AQMD 2022 Air Quality Management Plan,⁹ specifically:
 - a) Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
 - b) Appendix IV-B – CARB’s Strategy for South Coast
 - c) Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.¹⁰

Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

On May 7, 2021, South Coast AQMD’s Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt to earn Points on behalf of their tenants if they so choose, because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance, the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of a 403,033 sf warehouse, the Proposed Project’s warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements

⁸ State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>

⁹ South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

¹⁰ United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution>.

and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation¹¹. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov. For implementation of guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.¹²

South Coast AQMD Air Permits and Role as a Responsible Agency

Section 4.1 (Air Quality) of the Draft EIR assumes that the Proposed Project would include the installation of one 300-horsepower (hp) diesel-powered fire pump and one 700-hp diesel-powered emergency generator.¹³ Therefore, one or more air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,¹⁴ Rule 203 – Permit to Operate,¹⁵ Rule 401 – Visible Emissions,¹⁶ Rule 402 – Nuisance,¹⁷ Rule 403 – Fugitive Dust,¹⁸ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹⁹ Rule 1113 – Architectural Coatings,²⁰ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,²¹ Rule 1179 – Publicly Owned Treatment Works Operations,²² Regulation XIII – New Source Review,²³ Rule 1401 – New Source Review of Toxic Air Contaminants,²⁴ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,²⁵ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,²⁶ etc. It is important to note if air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(ab), the Lead Agency shall evaluate comments from public agencies on environmental issues and prepare a written response at least 10 days prior to certifying the Final SEIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10

¹¹ South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

¹² South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

¹³ Draft EIR, p. 4.1-15.

¹⁴ South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

¹⁵ South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

¹⁶ South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-401.pdf>

¹⁷ South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-402.pdf>

¹⁸ South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-403>

¹⁹ South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

²⁰ South Coast AQMD, Rule 1113 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

²¹ South Coast AQMD, Rule 1166 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

²² South Coast AQMD, Rule 1179 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

²³ South Coast AQMD, Regulation XIII is available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

²⁴ South Coast AQMD, Rule 1401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

²⁵ South Coast AQMD, Rule 1466 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

²⁶ South Coast AQMD, Rule 1470 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

days prior to the certification of the Final SEIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

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