



South Coast Air Quality Management District

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October 10, 2013

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City of Commerce
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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Malt Avenue Business Center (Plot Plan 984, 6009-6041 Malt Avenue)

The South Coast Air Quality Management District (SCAQMD) staff 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 the demolition of existing buildings totaling 96,445 square feet that were used as a manufacturing plant. The proposed warehouse-distribution use would include approximately 140,509 square feet on a 5.42-acre site. Ten loading docks would occupy the south side of the property. Construction is expected to take approximately 11-months to complete beginning in 2013. The project's opening year is planned for 2014.

In the Air Quality Analysis, the lead agency estimated air quality impacts using the California Emission Estimator Model (CalEEMod), Version 2011.1.1 that included a default daily trip rate of 2.59 trips per 1,000 square feet of floor area. The Traffic Impact Analysis, however, states the ITE land use category Number 150 for Warehousing, of which the daily trip rate is 3.56 daily trips. Since using the lower 2.59 trip rate will yield a smaller amount of emissions in the modeling than the 3.56 trip rate from the traffic study, the lead agency should clarify the discrepancy in the Final MND using a consistent trip rate, probably the 3.56 trip rate because it was based on the Traffic Impact Analysis. Otherwise, project operational emissions would be underestimated. In addition, it is not clear if the CalEEMod analysis adjusted the vehicle fleet mix to be consistent with the assumptions made in the traffic study.

Mr. Matt Marquez,
City Planner

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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 is available 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,



Ian MacMillan
Program Supervisor, Inter-Governmental Review
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IM:GM

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