



# 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 Inland Star Distribution Centers, Inc. Warehouse Conditional Use Permit Application**

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 MND.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to prepare, review, and consider the approval of Conditional Use Permit to include interior renovations and updates, and install a redundant line to provide secondary water service line on 188,495 square feet (Proposed Project). The Proposed Project currently involves a warehouse operation that stores regulated and non-regulated packaged chemicals and industrial materials for third party manufacturers and distributors<sup>1</sup>. However, the Proposed Project “does not include any expansion of the existing warehouse facility or loading dock, or any changes to the building exterior<sup>2</sup>.”

### SCAQMD Permits and Applicable Rules and Regulations

While the Proposed Project would include interior renovations and upgrades with no proposed changes to the existing storage materials, capacity, number of loading docks, or building footprint, it is recommended that the Lead Agency consult with SCAQMD's Engineering and Permitting staff to determine if a permit from SCAQMD will be required, and if any applicable SCAQMD rules and regulations should be discussed to demonstrate compliance in the Final MND. If SCAQMD permits are required, the Lead Agency should specifically identify SCAQMD as a Responsible Agency for the Proposed Project in the Final MND. The assumptions in the air quality analysis in the CEQA document will be used as the basis for permit conditions and limits. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by SCAQMD for determining operational health impacts for permitting applications and also for all CEQA projects where SCAQMD is the Lead Agency. Should there be any questions on permits, please contact the SCAQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>.

### Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information

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<sup>1</sup> MND, Page 1.

<sup>2</sup> *Ibid.*

do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov), should you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

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