



# South Coast Air Quality Management District

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Mr. Oscar Orci  
City of Banning  
Department of Planning  
99 E. Ramsey  
Banning, CA 92220

## **Draft Mitigated Negative Declaration** **for the Proposed Tentative Tract Map 33255**

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.

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

Steve Smith, Ph. D.  
Program Supervisor, CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:GM

RVC060113-09  
Control Number

**Draft Mitigated Negative Declaration**  
**for the Proposed Tentative Tract Map 33255**

**Construction Emission Estimates**

1. In order to document the Grading Equipment Emissions estimates in Table 1 on page 7 of the Draft MND, the SCAQMD recommends that lead agency include estimates and documentation (equations, emission factors [including source], methodologies, and assumptions, etc.) for emission impacts from building construction, architectural coatings, asphalt paving and associated worker trips in the Final MND. Technical emission estimates for employee commute trips during site grading should also be included as part of the MND text or as a separate appendix. The SCAQMD recommends that the lead agency analyze construction worker commute trip emission impacts using the most current version of EMFAC, EMFAC 2002. The current model can be obtained at the following website: [http://www.arb.ca.gov/msei/on-road/latest\\_version.htm](http://www.arb.ca.gov/msei/on-road/latest_version.htm) . The lead agency could also use on-road mobile source emission factors derived by SCAQMD staff from CARB's BURDEN2002 model. These emission factors can be found at the following website: <http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html> . The estimated air quality impacts from each phase of construction, (e.g., site preparation/grading and construction/laying asphalt pavement/painting the structures) should then be totaled and compared to the recommended daily significance thresholds in Table 1 on page 7 to determine if any of the projected emissions from the proposed project's construction phases are significant. In the event any of the revised air quality impacts are concluded to be significant, feasible mitigation measures should be identified and, if available, implemented by the project proponent. Technical information could be added as part of the narration or in a separate appendix.
  
2. In Section III. a)-d) on page 6, the lead agency determined that site grading would generate 264 pounds per day of PM10 fugitive dust, which would exceed SCAQMD's recommended daily significance threshold of 150 pounds per day. On page 8, the lead agency describes dust management practices that are to be required as part of the grading permit process, but does not provide control efficiencies or calculate the effects of those measures to the unmitigated PM10 estimate total to support its determination on page 8 that the implementing of the mitigation measures would reduce site grading fugitive dust estimates to be less than significant. In the Final MND, it is recommended that the lead agency identify and calculate the effects of the control efficiencies associated with the proposed mitigation measures and then provide a quantitative mitigated PM10 emission estimate for site grading to support its finding of less than significant impact. Control efficiencies can be obtained from chapter 11 of the SCAQMD CEQA Air Quality Handbook.

**Operational Emission Estimates**

3. In Table 2 on page 8 of the Draft MND (Moving Exhaust Emission Projections at Project Buildout), the lead agency uses the EMFAC7G to estimate operational air quality impacts from mobile sources. As a result, the analysis in the Draft MND using the EMFAC7G model may have substantially underestimated air quality impacts of the proposed project. Similar to the recommendation for calculating construction on-road emissions (see comment #1), it is recommended the lead agency recalculate operational mobile source emissions using EMFAC2002. The CARB URBEMIS 2002 computer model also uses EMFAC 2002 emission factors to estimate on-road mobile source emissions. The URBEMIS 2002 emissions model can be accessed at:  
<http://www.arb.ca.gov/planning/urbemis/urbemis2002/urbemis2002.htm> .

**Local Significance Threshold**

4. Because the proposed site is located near an existing high school and single-family residential uses (page 1 in the Environmental checklist Form of the Draft MND), a localized air quality analysis may be warranted to ensure that any nearby residents or students at the existing high school 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> .