



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

FAXED: May 19, 2006

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Ms. Shonda Bello Herold  
City of Banning  
Department of Planning  
99 E. Ramsey  
Banning, CA 92220

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Tentative  
Tract Map No. 33540**

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 (Final MND).

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

Susan Nakamura  
Planning & Rules Manager  
Planning, Rule Development & Area Sources

Attachment

SN:GM

RVC060421-04  
Control Number

**Project Phasing Information Incomplete or Missing**

1. Under Section III. Air Quality and in the project description, the lead agency does not include in the Draft MND any information regarding the phasing, length for each construction phase, whether any activities overlap, start or anticipated completion dates for potential construction sub-phases, i.e., site preparation, building construction, etc. in the Draft MND. This information is necessary to more accurately characterize potential impacts. Therefore, it is recommended that the lead agency include this information for each phase of construction and the estimated length of time for each construction sub-phase. The lead agency should also clarify if the construction activities will overlap. If the construction phases overlap, then the estimates for any overlapping phases should be combined and compared to the SCAQMD's recommended daily significance thresholds as a worst-case estimate.

**PM10 (Fugitive Dust) Construction Emissions Estimate Information Incomplete**

2. In Section III. a)-d) under Air Quality, the lead agency estimates construction PM10 fugitive dust impacts to be 1,716 pounds per day during mass grading. The lead agency does not include in the Draft MND the technical details of how it estimated the 1,716 pounds per day of PM10 fugitive dust, i.e., emission factors, methodologies, and control efficiencies for the proposed mitigation measures. In addition, the Draft MND does not detail the potential cut and fill of the terracing described in Section III or discuss if soil will be imported or exported during the project. Because this information has not been included in the Draft MND, the lead agency has therefore not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts.

The Draft MND should contain sufficient technical detail to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Therefore, the Final MND should include the emission estimates, emission factors, methodologies, output sheets from any computer modeling and control efficiencies for the proposed mitigation measures. This information could be included in the Final MND as part of the narration or as an appendix.

In the event that additional quantification of the air quality impacts from the proposed project is required to account for cut and fill or soil hauling, the lead agency should revise its estimates for construction air quality impacts in the Final MND. In the event either construction and/or operational, exceed established significance thresholds, additional mitigation measures may be necessary. In addition to identifying feasible mitigation measures, the lead agency should specify the control efficiency of each mitigation measure (if one is available) and apply the control efficiency to the total emissions estimated for the project. In this way the lead agency can quantitatively determine the significance of air quality impacts from the proposed project.

**Architectural Coating, Asphalt Paving and Employee Trips not estimated**

3. The lead agency did not estimate emissions for the architectural coating, asphalt paving or employee trips associated with these construction activities. Based on the size of the project, VOC emissions from architectural coatings in particular could be substantial.

**Local Significance Threshold**

4. Because the proposed site is located less than a quarter-mile from an existing single- and multi-family residential sites, a localized air quality analysis may be warranted to ensure that the residents in the existing residential sites 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> .

**Construction Mitigation Measures for VOC**

5. The SCAQMD recommends that the lead agency consider the following mitigation measure, if feasible, to reduce volatile organic compounds (VOC) emissions from construction activities should the lead agency's estimates of VOC emission impacts prove to be significant:

## Recommended Additions:

1. Use required coatings and solvents with a VOC content lower than required under Rule 1113.
2. Construct/build with materials that do not require painting
3. Contractors shall use high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50%.
4. Restrict daily coating usage to less than approximately 65 gallons per day (assuming a VOC content of 1.1 pound per gallon).

**Construction Mitigation Measures for NO<sub>x</sub> and PM<sub>10</sub> (Fugitive Dust)**

6. Should the lead agency, after final review (see comment #2), determine that the short-term (construction) air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for nitrogen oxide (NO<sub>x</sub>) and particulate matter (PM<sub>10</sub>), the SCAQMD recommends that the lead agency consider modifying the following mitigation measures and adding additional mitigation measures to further reduce construction air quality impacts from the project, if applicable and feasible:

Recommended changes:

The following change is recommended to reduce fugitive dust:

7. All excavation and grading activities shall be suspended during wind speeds of 25 miles per hour as instantaneous gusts or greater.

Recommended additions:

The following is a list of additional recommended mitigation measures to further reduce fugitive dust:

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Replace ground cover in disturbed areas as quickly as possible;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Pave road and road shoulders;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less;