



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
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SENT VIA E-MAIL AND USPS:

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[spierce@ci.banning.ca.us](mailto:spierce@ci.banning.ca.us)

Sonia Pierce, Senior Planner  
City of Banning, Community Development Department  
99 E. Ramsey Street  
Banning, CA 92220

## **Mitigated Negative Declaration (ND) for the Proposed General Plan Amendment GPA 18-2501, Zone Change 18-3501, and Design Review 18-7001**

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 ND.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to develop a 146,890-square-foot warehouse on 19.69 acres (Proposed Project). Based on a review of the Project Location in the Notice of Availability and Intent to Adopt a Mitigated Negative Declaration (Notice) for the Proposed Project, SCAQMD staff found that residential uses are located within 1,000 feet south of the Proposed Project.

### SCAQMD Staff's Comments

As a public commenting agency, SCAQMD staff reviews and may comment on the CEQA documents. SCAQMD staff's goal is to ensure that project emissions and health risk impacts are adequately and sufficiently evaluated, disclosed, and mitigated to the maximum extent feasible. According to the Notice, a copy of the MND for the Proposed Project is available at the City Community Development Department website at <http://ci.banning.ca.us/DocumentCenter/View/6124/Lawrence-Equipment-Studies>. However, after examining the document that was posted at this web address, SCAQMD staff found that the document was a Traffic Impact Analysis Report, dated August 6, 2018. It was not a MND required under CEQA Guidelines Section 15070 to 15075. As such, SCAQMD staff was not able to review the MND and the Air Quality Impact Analysis, including the Health Risks Assessment at this time. The MND should include sufficient information as substantial evidence to support a fair argument that the Proposed Project would not have any adverse effects on air quality impacts and health risk impacts. Since the document that was made available for public review from January 11, 2019 to January 31, 2019 represented only a portion of the environmental analysis for the Proposed Project, and to provide meaningful comments on the air quality analysis for the Proposed Project that will enable informed decision-making and public participation, SCAQMD staff recommends that the Lead Agency recirculate the MND in its entirety for public review.

### 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 the SCAQMD with written responses to all comments contained herein prior to the certification 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 do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful 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) if you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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