



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 (MND) for the Proposed Tentative Tract Map 31924; Tentative Parcel Map 32092; General Plan Amendments to the Circulation Element

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 (MND).

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

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

Attachment

SS:GM

RVC050318-01
Control Number

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1. In Section 3. Air Quality on page 12 of the Draft Mitigated Negative Declaration (Draft MND), the lead agency has determined that air quality impacts would be less than significant with mitigation incorporated. In the Draft document, however, the lead agency has not included even summary information from the studies cited on page 12, East Banning Residential Development Air Quality Impact Analysis by Urban Crossroads, May 2004 (Urban Crossroads study) and East Banning Residential Development Air Quality Impact Analysis by Urban Crossroads, May 2004 (Urban Crossroads {Revised} study), used to demonstrate that project construction and operational air quality impacts are less than significant. Because of the lack of supporting detail the lead agency has therefore not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts.

Further, the lead agency has proposed mitigation measures for short- and long-term impacts on page 13 and 14 of the Draft MND, which address:

- a) Potential construction phase emissions from site preparation and building construction for reactive organic gases (ROG), oxides of nitrogen (NOx), and carbon monoxide (CO), which the Urban Crossroads study concluded that unmitigated construction emissions would exceed threshold criteria for ROG, NOx and CO (Urban Crossroads study).
- b) The lead agency's estimating PM10 emissions for site grading on page 13 of the Draft MND using Table A9-9 of the SCAQMD's CEQA Air Quality Handbook (Handbook) concluding that PM10 emissions would be significant without mitigation. The lead agency proposed mitigation measures to reduce PM10 emissions from site grading on pages 13 and 14 but did not demonstrate that these measures would reduce PM10 impacts below the threshold of significance.
- c) Operational impacts estimated by the lead agency concluded that the SCAQMD daily thresholds would be exceeded for NOx without mitigation (Urban Crossroads {Revised} study).

Pursuant to CEQA Guidelines §15147, 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, control efficiencies for any proposed mitigation measures, and identify significance thresholds for the proposed project. This information could be included in the Final MND as part of the narration or as an appendix. Based on the limited information provided in the

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Draft MND, it appears that construction and operational air impacts are significant. As such, the project does not qualify for a negative declaration.

2. From the projected traffic impacts on affected intersections based on the traffic analysis described on page 40 (East Banning Residential Traffic Impact Analysis {Revised} May 2004) (Urban Crossroads {Revised} study), the lead agency concludes that with the incorporation of traffic improvements listed in pages 41-42 project traffic impacts would be reduced to less than significant levels.”

Although the lead agency states that the measures will reduce traffic emission impacts and has described the proposed mitigation measures for the intersections listed that would be significantly adversely affected by the proposed project, the lead agency has not demonstrated quantitatively that the addition of the measures will reduce air quality impacts from congestion to below the applicable thresholds of significance. In the Final MND, the lead agency should list the existing and future project volume to capacity and level of service impacts including the affects of the proposed measures from the Urban Crossroads (Revised) study. This quantification information of the effects of the mitigation measures from the study is important because the results may warrant performing a CO hotspots analysis.

The SCAQMD recommends performing the CO hotspots analysis if the volume to capacity ratio increases by two percent or more as a result of a proposed project for intersections rated D or worse. The proposed project’s level of service deterioration from the B and C range to D or worse would qualify for a CO hotspots analysis.

3. It is recommended that the lead agency investigate the availability of aqueous diesel fuel and off-road mobile sources equipped with EGR and diesel particulate filters. Currently, the availability of equipment filters with these technologies is relatively limited, so they may not be available for use by the project proponent to completely mitigate construction air quality impacts. It is recommended that the lead agency document the availability of construction equipment fitted with control technologies and the availability of low sulfur diesel or aqueous diesel projects or identify additional mitigations to ensure that construction air quality impacts are not significant.