



South Coast
Air Quality Management District

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E-MAILED: JULY, 21, 2011

July 21, 2011

Ms. Zai Abu Bakar, Director, zabubakar@ci.banning.ca.us
Community Development Department
City of Banning
99 E. Ramsey Street
Banning, CA 92220

**Draft Environmental Impact Report (Draft EIR) for the Proposed Butterfield
Specific Plan (SCH# 2007091149)**

The South Coast Air Quality Management District (AQMD) 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 CEQA document.

In the project description, the lead agency proposes the construction of a maximum of 5,387 residential dwelling units (936.4 acres); a golf course and open space (253.9 acres); parks (66.5 acres); two school sites (23.0 acres); commercial/office sites (36.0 acres); and other development on a total area of approximately 1,543 acres. The AQMD staff has concerns regarding the air quality construction and operational air quality analyses for regional emissions and is also concerned that the lead agency has not estimate localized air quality impacts. The AQMD staff is also concerned that the Draft EIR does not include specific targets to reduce the large increase in project operational mobile sources and the associated operational emissions generated consistent with the emission reduction targets established by SB 375. Finally, the Final EIR should include emission estimates and supporting documentation for emissions generated by the construction and operation of the proposed waste water treatment plant (WWTP). AQMD requirements including permits for applicable equipment and odor controls for the construction and operation of the proposed waste water treatment plant (WWTP) should also be cited in the Final EIR. Detailed comments are attached in this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality 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.

Ms. Zai Abu Bakar,
Director

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July 21, 2011

Sincerely,

A handwritten signature in black ink, appearing to read "Ian V. MacMillan". The signature is written in a cursive, flowing style.

Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:GM

RVC110607-15
Control Number

Fugitive Dust Emissions From Construction Activities

1. The URBEMIS2007 model outputs presented in Appendix B include a variety of mitigation measures to control fugitive dust, including many identified in Tables 4.3-5 and 4.3-7. Unfortunately, due to a known calculation error within the URBEMIS2007 model,¹ applying all mitigation measures results in spuriously high dust control efficiencies (e.g., up to 84% for this project). In order to correct this error, AQMD staff recommends that the lead agency only include the single highest control measure in the URBEMIS model run. Depending on each project, this would be either the application of water 3 times per day or chemical suppressants. The higher resultant PM10 emissions may exceed AQMD's regional thresholds.
2. In Table 4.3-7 Phase 3 Construction Air Emissions, unmitigated and mitigated emission estimates are substantially different than the URBEMIS2007 computer output sheets for Phase 3 shown in Appendix B of the Draft EIR. For example, Year 2019 unmitigated grading emissions show 3,084.92 pounds per day for PM10, 646.46 pounds per day of PM2.5, 79.56 pounds per day of NOx, 11.12 pounds per day of ROG, and 47.71 pounds per day of CO. The URBEMIS2007 output sheets, however, show 609.35 pounds per day for PM10, 133.87 pounds per day of PM2.5, 238.69 pounds per day of NOx, 33.36 pounds per day of ROG, and 143.13 pounds per day of CO. There are also differences between the emissions reported in Table 4.3-8 Phase 4 Construction Emissions where in Year 2032 NOx is shown to be less than significant in the table (unmitigated 42.81 pounds per day) but exceeds the recommended threshold level of 100 pounds per day for NOx in the corresponding URBEMIS output sheets (128.44 pounds per day). Table 4.3-9 Phase 5 Construction Air Emissions for Year 2035 and its corresponding URBEMIS output sheets have a similar concern. In the Final EIR, these differences should be clarified and revised as needed (see also comment #1 regarding mitigation measure control efficiencies in the URBEMIS model).

Localized Significance Thresholds Analysis

3. Although regional project emission impacts have been estimated, the lead agency has not estimated localized air quality impacts. The AQMD staff recommends that the lead agency either:
 - 1) Estimate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity, or
 - 2) Commit to conducting additional CEQA analysis (including localized impacts) for each specific phase of this project prior to its development.

It is noted on page 3.0-1 under surrounding land uses and in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (residential uses, a pre-school, and two hospitals) surrounding the proposed project.

¹ www.aqmd.gov/ceqa/models.html

AQMD guidance for performing a localized air quality analysis can be found on the AQMD web page.² The AQMD's LST guidance is voluntary but a lead agency still must demonstrate under CEQA that a project does not exceed applicable Ambient Air Quality Standards during construction and operation. Should the lead agency conclude after its analyses that construction or operational localized air quality impacts exceed the AQMD daily significance thresholds, staff has compiled mitigation measures in addition to those measures listed starting on page 4.3-29 of the Draft EIR that can be implemented if the air quality impacts are determined to be significant.³

Mobile Source Emission Impacts

4. Based on a review of the draft EIR the AQMD staff is concerned about the project's operational air quality impacts. Specifically, the lead agency has determined that the project's operational phase will exceed the AQMD's CEQA significance thresholds resulting in significant regional and cumulative air quality impacts. The project's operational air quality impacts are primarily from mobile source emissions related to the significant increase of vehicle trips (62,263 daily trips) associated with the proposed project. The lead agency has discussed recommended reduction targets from various regional agencies including the Southern California Association of Governments (SCAG). For example, SCAG has adopted regional greenhouse gas (GHG) emission reduction targets under SB 375 of 8% by 2020 and 13% 2035. The lead agency has also recommended a specific measures on page 4.5-46 to reduce transportation and related air quality impacts but has not stipulated specific targets to reduce the large increase in mobile source emissions allowed under the proposed project. A reduction in GHGs will very likely provide co-benefits by reducing criteria pollutant emissions. Therefore, the AQMD staff recommends that the lead agency include quantitative targets and/or performance standards for the development of this plan in order to minimize the project's significant air quality impacts. Potential quantifiable mitigation measures are included in the greenhouse gas quantification report⁴ published by the California Air Pollution Control Officer's Association in the final EIR.

Operational Air Quality Impacts

5. In the project description, the proposed project includes the potential construction and operation of an on-site waste water treatment plant (WWTP) that would operate 24-hours a day treating up to 1.5 to 2.0 million gallons per day (mgd) of wastewater. In the Final EIR, the lead agency should quantify the short- and long-term air quality impacts from the WWTP activities (e.g., emergency diesel generators, treatment process emissions, etc.) and include the assumptions, emission calculations, emission

² <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

⁴ California Air Pollution Control Officer's Association, August 2010. Quantifying Greenhouse Gas Mitigation Measures. Accessed at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

factors, methodologies used, etc. in the Final EIR. If the lead agency does not quantify these emissions in the Final EIR, then the lead agency should commit to providing additional CEQA review that includes the aforementioned analysis. As the AQMD is a responsible agency due to its permitting authority for emissions from waste water treatment processes, this additional analysis would be required prior to issuance of any permit.

Permit Requirements/Odors Control

6. The equipment used during the on-site waste water treatment plant operations may require permits from the AQMD. Therefore, the lead agency should cite compliance with applicable AQMD rules in the Final EIR. AQMD Rule 201 – Permit to Construct and Rule 203- Permit to Operate would apply for the use of backup diesel generators to pump waste water, recycled water, and potable water. Also, if volatile organic compounds are encountered during soil disturbance, then Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil would apply. Rule 1150 - Excavation of Landfill would apply if refuse is present in the soil. Lastly, odors from wastewater treatment would have to be prevented, so ventilation from the building to an appropriate odor control device (e.g., biofilter, scrubber, activated carbon, etc.) may be required. Permit or odor control questions can be directed to AQMD staff at (909) 396-2684.

Construction Mitigation Measures

7. In the Draft EIR, the lead agency has determined that construction air quality impacts will exceed the recommended daily significance threshold for reactive organic compounds (ROG). In the event that the lead agency determines that construction air quality impacts will also exceed the AQMD's daily significance threshold for oxides of nitrogen (NOx), carbon monoxide (CO), particulate matter PM10, and PM2.5 (see comments numbers 1-3), the AQMD staff recommends that the lead agency also consider adding the following mitigation measures in addition to the measures listed starting on page 4.3-29 to further reduce adverse project construction air quality impacts, if applicable and feasible:

Recommended Additional Mitigation Measures:

- 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;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- Reroute construction trucks away from congested streets or sensitive receptor areas;
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water); and

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

Additional mitigation measures for consideration by the lead agency for off- and on-road engines and fugitive dust are also available at the AQMD website.⁵

⁵ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html