



# South Coast Air Quality Management District

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E-MAILED: NOVEMBER 2, 2012

November 2, 2012

Ms. Zai Abu Bakar, Director, [zabubakar@ci.banning.ca.us](mailto: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 City of Banning Circulation Element General Plan Amendment**

The South Coast Air Quality Management District (AQMD) staff appreciates the cooperation that city staff has demonstrated with this project and 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 to amend the General Plan Circulation Element to include a policy change to the acceptable Level of Service (LOS) for roadway operating conditions throughout the city. The lead agency proposes changing the acceptable LOS threshold from LOS C to LOS D. In addition, the agency proposes to replace the future planned Interstate 10/Highland Home Road interchange with an overcrossing. AQMD staff requests clarification about the air quality analysis and consistency with the Regional Transportation Plan (RTP) developed by the Southern California Association of Governments and the AQMD's Air Quality Management Plan. The AQMD also has an additional comment concerning the presentation of truck routes in the Circulation Element. Details regarding these comments follow in the attachment.

Lastly, in order to minimize any potential impacts from this project, AQMD staff recommends that the lead agency consider other measures that may help to mitigate the increased congestion. This could include enhancing non-vehicular travel options such as walking, biking, and/or transit, and considering how the proposed threshold may impact sensitive receptors (such as schools or daycare centers) located next to particular intersections and roadways.

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  
Community Development Department

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November 2, 2012

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial 'I' and 'M'.

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

Attachment  
IM:GM

RVC120925-04  
Control Number

### **Air Quality Emissions Calculations**

1. The Air Quality analysis in the Draft EIR presents the emissions of the proposed project and the existing General Plan in Table 4.1-F. In Appendix A of the Air Quality technical appendix, the tables used to calculate these emissions are presented. Although the emission calculations are not presented, it appears that the emissions were derived by multiplying the EMFAC 2007 emission factor at a speed of 30 mph by the VMT for two scenarios, with interchange (baseline) and with overcrossing (proposed project). AQMD staff requests some clarification regarding this calculation in the Final EIR. First, it is not clear that the speed will be consistent both with the existing LOS C threshold and the proposed LOS D threshold. The Final EIR should clarify how the proposed project may affect speed, and what effect this might have on emissions. Second, the details of the EMFAC run should be included in the Final EIR. These details include the assumed buildout year, the geographic area, fleet mix, and season. Lastly, the lead agency should consider using the most recent version of EMFAC (2011) when completing these calculations.

### **Consistency with the Air Quality Management Plan**

2. Page 4.1-16 of the Draft EIR states that for a project to be consistent with the AQMP, “the pollutants emitted from the project should not exceed the SCAQMD daily threshold or cause a significant impact on air quality, or the project must already have been included in the AQMP projection.” The Draft EIR then concludes that since the project does not exceed AQMD thresholds, that this impact is less than significant. This conclusion is partially inconsistent with the AQMD CEQA Handbook Guidance. The AQMD CEQA Handbook recommends that projects apply both of the following tests to determine consistency with the AQMP. 1) Will the project result in an increase in the frequency or severity of existing air quality violations or cause or contribute to a new violation, or delay timely attainment of air quality standards? 2) Will the project exceed the assumptions in the AQMP?

Typically the first test is satisfied by the quantified air quality analysis in the rest of the Air Quality chapter (this project analysis shows that the first test yields a less than significant impact). However the second test is usually evaluated by determining if the project is contained within the latest Regional Transportation Plan from the Southern California Association of Governments that is fed into the Air Quality Management Plan modeling. The 2007 AQMP is based on the 2004 RTP, while the Draft 2012 AQMP is based on the 2012 RTP. Page 4.6-8 of the Draft EIR indicates that the currently conforming RTP is the 2008 RTP. However the 2012 RTP was determined to be conforming by the Federal Highway Administration and the Federal Transit Administration on June 4, 2012, prior to the circulation of the Draft EIR for the proposed project. The Final EIR should therefore discuss if this proposed project is consistent with the assumptions in both the 2004 and the 2012 RTP, including the proposed degradation of LOS from C to D.

**Existing General Plan Street System in the Circulation Element**

3. Currently truck routes are described in narrative form in City Council Resolution Number 2005-91 but not included in Figure 3.3 (Existing General Plan Street System) or any other graphic within the City of Banning Circulation Element or Draft EIR. For ease in viewing by residents, business and other interested parties, the AQMD staff recommends that the lead agency's approved truck routes be shown in the Final EIR similar to Figure 3.3, which highlights the current General Plan Street System. These truck routes should also be reviewed and modified as necessary to ensure that significant diesel truck traffic from recent and future projects does not adversely impact nearby homes, schools, and other sensitive receptors.