



**South Coast  
Air Quality Management District**  
21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:  
[bguillot@ci.banning.ca.us](mailto:bguillot@ci.banning.ca.us)

July 29, 2016

Mr. Brian Guillot, Community Development Director  
City of Banning – Community Development Department  
99 E. Ramsey St.,  
Banning, CA 92220

**Draft Environmental Impact Report (EIR) for the  
Rancho San Geronio Specific Plan**

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 EIR.

In the project description, the Lead Agency proposes to develop an 831-acre master-planned community consisting of residential, commercial, open space, and recreational areas. Approximately 3,385 residential units are proposed to be constructed over six phases. The proposed Project will take 18 years to construct. In the Air Quality Section, the Lead Agency quantified the Project's construction and operation air quality impacts and compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. Based on its analyses, the Lead Agency has determined that construction and operational emissions of the Project would exceed regional ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> thresholds. Even with the proposed mitigation measures, the regional and localized impacts from construction emissions associated with the Project would be significant and unavoidable. The SCAQMD staff recommends that the proposed Project include all feasible mitigation measures in the Final EIR to further reduce the projected significant construction impacts. Details are included in the attachment.

Furthermore, with construction lasting 18 years, construction and operation activities begin overlapping in 2019. The air quality analysis does not account for the overlapping construction and operational phases, and therefore, under-estimate the project's air quality impacts during those years. For example, total project regional emissions in year 2019 should include emissions from the operation during Phase 1, operation during Phase 2 and construction emissions occurring in Phase 3. SCAQMD staff recommend revising the air quality analysis in the Final EIR to account for the overlapping construction and operational phases and comparing the total project regional emissions estimates with the SCAQMD long-term operational thresholds of significance.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely

*Jillian Wong*

Jillian Wong Ph.D.

Planning & Rules Manager

Planning, Rule Development & Area Sources

JW:JC

RVC160621-07

Control Number

### **Additional Construction Mitigation Measures**

- Since the Project is considered a large operation (50 acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin, the Lead Agency is required to comply with all SCAQMD Rule 403(e) – Additional Requirements for Large Operations. This may include but not limited to Large Operation Notification, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class. Therefore, the Final EIR should contain a detailed description of how the Project will comply with [Rule 403\(e\)](#). Please contact [dustcontrol@aqmd.gov](mailto:dustcontrol@aqmd.gov) for more information.

Additional requirements include but are not limited to:

- Implementation of Table 2 of Rule 403 at all times and implementation of the actions specified in Table 3 of Rule 403 when applicable.
  - Submittal of a fully executed Large Operation Notification to the Executive Officer.
  - Maintenance of daily records to document the specific dust control actions taken.
  - Installation and maintenance of project signage with project contact person that meets the minimum standards of Rule 403 Implementation Handbook.
  - Identification of a dust control supervisor that has completed the AQMD Fugitive Dust Control Class.
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and import/export) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
  - Encourage construction contractors to apply for SCAQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for SCAQMD “SOON” funds. The “SOON” program provides funds to accelerate cleanup of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: [www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).