



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Mitigated Negative Declaration (MND) for the Proposed Tentative Tract Map SUBTT20140 and Tree Removal Permit DRC2017-00823 Project**

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 CEQA document.

### SCAQMD Staff's Summary of Project Description

The lead agency proposes to construct 14 single-family residences on 9.49 acres. The project is located at 6527 Etiwanda Avenue in the City of Rancho Cucamonga. Upon review of the MND, SCAQMD staff found that proposed project is within 500 feet of State Route 210 (SR-210).

### SCAQMD Staff's Summary of Air Quality Analysis

In the air quality analysis, the lead agency determined that the proposed project would have less than significant impacts to air quality. However, the lead agency did not prepare a Health Risk Assessment (HRA) that discloses the potential air quality impacts associated with placing sensitive receptors (i.e. residents) in close proximity to a major highway. Please see SCAQMD staff's detailed comment below.

### SCAQMD Staff's Comments

The proposed project will place sensitive receptors within 500 feet of SR-210, a major highway with over 100,000 average daily trips.<sup>1</sup> Future residents at the proposed project may be exposed to toxic air contaminants (TACs), such as diesel particulate matter (DPM), from vehicles and heavy duty, diesel-fueled trucks traveling on the freeway. To facilitate the purpose and goal of CEQA on public disclosure, SCAQMD staff recommends that the lead agency consider the impacts of air pollutants, such as DPM, on people who will live at the proposed project by performing an HRA analysis.<sup>2</sup> Results of the HRA should be disclosed in the final CEQA document.<sup>3</sup> Additional guidance for siting sensitive receptors near high-volume freeways and other sources of air pollution can be found in the California Air Resources Board's Air Quality and Land Use Handbook: *A Community Health Perspective*.<sup>4</sup> There are also many strategies that can be applied to help reduce residential exposure to TACs from nearby highways, such as installing and maintaining enhanced filtration systems, sound walls, and vegetative barriers.

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<sup>1</sup> Caltrans Traffic Volumes 2016. Accessed at: <https://data.ca.gov/dataset/caltrans-traffic-volumes>

<sup>2</sup> South Coast Air Quality Management District. "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis." Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>3</sup> SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as a lead agency, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million, determines the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

<sup>4</sup> California Air Resources Board. "Air Quality and Land Use Handbook: *A Community Health Perspective*." Accessed at: <http://www.arb.ca.gov/ch/handbook.pdf>

The lead agency should carefully evaluate the effectiveness and feasibility of these strategies before implementation. For example, enhanced filtration systems have varying efficiency ratings and associated cost burdens.<sup>5</sup> Additionally, they require enforceability in the form of installation, explanation of purpose and use, and annual maintenance.

#### Closing

Pursuant to CEQA Guidelines Section 15074, prior to approving the proposed project, the lead agency shall consider the final CEQA document for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to the comment contained herein prior to the adoption of the final CEQA document. 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 Alina Mullins, Assistant Air Quality Specialist, at [amullins@aqmd.gov](mailto:amullins@aqmd.gov) or (909) 396-2402, should you have any questions.

Sincerely,

*Daniel Garcia*

Daniel Garcia

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DG/AM

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<sup>5</sup> This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/defaultsource/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see also 2012 Peer Review Journal article by SCAQMD: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.