

## E-MAILED: OCTOBER 13, 2009

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Mr. Mike Smith, Associate Planner Planning Division City of Rancho Cucamonga 10500 Civic Center Drive Rancho Cucamonga, CA 91730

## Draft Negative Declaration (Draft ND) for the Proposed EA and CUP DRC2009-00412 - Upland Christian Academy

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 Negative Declaration.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final ND. 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,

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Susan Nakamura Planning Manager Planning, Rule Development & Area Sources

Attachment

SN:EE:GM

SBC090922-03 Control Number

## **Disclosure of Potential Toxic Sources**

In the project description of the Draft Initial Study/Negative Declaration (Draft IS/ND), the lead agency proposes operation of a private school for Kindergarten to 12<sup>th</sup> grade with up to 600 students and 80 staff members within existing buildings including the proposal to complete a sports field in the southeast corner of the site. The proposed school site is located on and surrounded by property that is designated and zoned Industrial Park and light industrial development uses are located east, across the street from the proposed school site. CEQA Guidelines §15186. School Facilities, establishes special requirements for certain school projects to ensure potential health impacts are properly disclosed in CEQA documents. The SCAQMD staff wants to bring this section of the CEQA Guidelines to the attention of the Lead Agency to ensure the students and faculty of the proposed school are adequately protected.

## Siting of Future Sensitive Land Uses Near Existing Industrial Sources

2. According to the Air Quality and Land Use Handbook developed by the California Air Resources Board (April 2005), siting of new sensitive land uses such as residences, schools, and daycare centers should be developed with a minimum separation between new sensitive land uses and existing sources. The Air Quality Land Use Handbook recommends a separation zone of 1,000 feet for distribution centers (there appears to be a warehouse distribution center approximately 1,500 feet southeast of the project boundary on Arrow Route and Milliken Avenue). For these adjacent undeveloped areas, an adequate separation between the existing industrial uses and any new sensitive land use will minimize localized air quality impacts. The SCAQMD staff requests that the lead agency review the Air Quality and Land Use Handbook, which is available at: <a href="http://www.arb.ca.gov/ch/landuse.htm">http://www.arb.ca.gov/ch/landuse.htm</a>.