



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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michael.smith@cityofrc.us

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Mr. Mike Smith
Planning Department
City of Rancho Cucamonga
P.O. Box 807
Rancho Cucamonga, CA 91729

Review of the Draft Mitigated Negative Declaration (Draft MND) for the Proposed Tentative Tract Map SUBTT18122 Project

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 environmental document as appropriate.

The AQMD staff is concerned that the lead agency has not demonstrated that the proposed project will have less than significant air quality impacts absent a health risk assessment and greenhouse gas (GHG) emissions analysis for the project. Specifically, the lead agency should quantify the potential health risk impacts to future sensitive receptors (i.e., residents) at the project site which is located only 135 feet away from the 210 Freeway. The 210 Freeway is a potentially significant source of toxic air pollutants due to the approximate 153,000 vehicles per day that travel along this section. Consistent with the CARB Land Use Handbook¹ the lead agency should include mitigation in the final CEQA document that precludes any sensitive land uses within 500 feet of the 210 Freeway. Further, AQMD staff recommends that pursuant to Section 15064.4 of the CEQA Guidelines; “the lead agency should make a good faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project.” Therefore, the lead agency should revise the CEQA document to include a HRA and GHG emissions analysis. In the event that the

¹ California Air Resources Board. April 2005. “Air Quality and Land Use Handbook: A Community Health Perspective.” Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

lead agency's revised CEQA document demonstrates significant adverse air quality impacts the lead agency should require mitigation pursuant to Section 15071 and/or 15092 of the CEQA Guidelines. Details regarding these comments are attached to this letter.

AQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

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

Attachment

IM:DG

SBC110429-02
Control Number

Potential Health Risk Impacts to Sensitive Land Uses

1. Based on the lead agency's discussion regarding toxic air contaminant (Section 5.3) of the Air Quality Analysis Report in the draft MND the proposed project includes sensitive land uses (i.e., residences) within 500 feet of the 210 Freeway. As a result, the AQMD staff is concerned about the potential health risk impacts from toxic air pollutants emitted by the significant volume of traffic that would travel in close proximity to these homes.

The lead agency relies on the use of air filters with a minimum efficiency reporting value (MERV) of 12 placed in residential HVAC systems to mitigate the project's health risk impacts from the 210 Freeway below the significance level. While these filters can be effective against particulate pollution they do not have the ability to remove a wide variety of gaseous pollutants (i.e., NO_x, TAC's and VOC's) associated with traffic-related pollution. These filters also have no effectiveness on outdoor activities associated with residential uses and require long term and potentially costly maintenance. Lastly, without quantifying the level of potential air quality impacts from the freeway, nor the effectiveness of the proposed mitigation measures, the lead agency has not demonstrated that this impact is less than significant. Therefore, AQMD staff recommends that the lead agency maintain the 500-foot buffer specified in the CARB Land Use Handbook for any new residential project built close to a freeway.

Quantification of Greenhouse Gas (GHG) Emissions

2. The AQMD staff is concerned that the lead agency has failed to calculate GHG emissions impacts from the proposed project. AQMD staff refers the lead agency to Section 15064.4 of the CEQA guidelines which requires that the lead agency "make a good faith effort" to quantify the GHG emissions impacts from the proposed project. Further, AQMD staff notes that based on the technical information provided in the Air Quality Analysis Report provided with the MND the lead agency has adequate technical information (e.g., type of construction equipment, hours of equipment operation, material delivery trips, energy consumption, vehicle miles traveled, etc.) to calculate the GHG emissions impacts from the proposed project. Therefore, AQMD staff requests that the lead agency revise the CEQA document to include a quantitative analysis of greenhouse gases, a determination of significance, and, if necessary, feasible mitigation measures. Either the URBEMIS 2007² or CalEEMod³ land use software model can be used to quantify these potential impacts and mitigation measures.

² The URBEMIS 2007 Software Model can be found at: <http://www.urbemis.com/>

³ The CalEEMod Software Model can be found at: <http://www.caleemod.com/>