



South Coast Air Quality Management District

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Review of the Mitigated Negative Declaration (MND) for the Proposed Tentative Tract SUBTT19968 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 MND.

According to the project description, the Lead Agency proposes to construct 11 new single family residential units located on a 5-acre site southeast of the East Avenue/Fisher Drive intersection in the City of Rancho Cucamonga. Currently, the majority of the project site is vacant. A church currently occupies a building located near the south end of the site and a historic house is also located on the property. The church building would be demolished as part of the project; however, the historic house would be retained. The proposed project would require construction of a new two-lane street connecting the western terminus of Whitestone Place with the northern terminus of Brownstone Place. Access to the project would be via East Avenue via Catalpa Street and Fisher Drive via Starstone Place.

The proposed project is less than 100 feet south of the State Route 210 Freeway, which has an average daily traffic volume of approximately 160,000 vehicles including approximately 7,488 diesel trucks. Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter, which is a toxic air contaminant. The SCAQMD staff therefore recommends that the Lead Agency conduct a mobile source health risk assessment (HRA) to disclose the potential health risks to the residents from vehicles that use the freeway including diesel-fueled vehicles that emit diesel particulate matter, which the California Air Resources Board (CARB) has determined to be carcinogenic. Guidance for performing a mobile source health risk assessment can be found at SCAQMD's website¹: This HRA should be included in the Final MND.

¹ *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, SCAQMD, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

Numerous health studies have demonstrated the potential adverse health effects of living near highly travelled roadways and major rail yards. As a result of these studies, in 2005 the California Air Resources Board (CARB) recommended avoiding siting housing within 500 feet of a freeway in their Land Use Handbook². Additional research has continued to support that the near roadway environment contains elevated levels of many pollutants that adversely affect human health, including some pollutants that are unregulated (e.g., ultrafine particles) and whose potential health effects are still emerging³. While the health science behind recommendations against placing new residences close to freeways is clear, the SCAQMD staff recognizes the many factors lead agencies must consider when siting new housing. Because of the potential health risks involved, it is critical that any proposed mitigation must be carefully evaluated prior to determining if those health risks would be brought below recognized significance thresholds. Based on the proposed project, the SCAQMD staff reiterates the CARB advisory recommendations that the final site plan in the Final MND include the 500 foot buffer between sensitive receptors in order to reduce the adverse health impacts from and the above-mentioned sources of Toxic Air Contaminant (TAC).

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 CEQA document. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Sam Wang, Air Quality Specialist – CEQA Section, at (909) 396-2649, if you have any questions regarding these comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

JW:SW
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² 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>

³ See Chapter 9 of the 2012 AQMP for further information at: [http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-\(february-2013\)/chapter-9-final-2012.pdf](http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/chapter-9-final-2012.pdf).