



# South Coast Air Quality Management District

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## **Review of the Draft Mitigated Negative Declaration (Draft MND) for the Tentative Tract Map SUBTT18744 and Variance DRC2009-00029**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the revised Draft or Final Mitigated Negative Declaration (Draft or Final MND) as appropriate.

On page one of the Environmental Checklist Form Initial Study Part II the lead agency states that the proposed project is located to the north of State Route 210 Freeway and the Day Creek Boulevard off ramp. Specifically, the proposed placement of 30 new residential units appears to be located approximately 100 feet north of the State Route 210 Freeway.

Recent research has revealed that pollutants found in close proximity to freeways are associated with a variety of adverse health effects, independent of regional air quality impacts<sup>1</sup>. These can include reduced lung capacity and growth<sup>2</sup>; cardiopulmonary disease<sup>3</sup>; increased incidence of low birth weight, premature birth, and birth defects<sup>4</sup>; and exacerbation of asthma<sup>5</sup>. In order to address air quality issues such as these that are related to incompatible land uses, the California Air Resources Board published its Air Quality and Land Use Handbook: A Community Perspective (CARB Land Use Handbook)<sup>6</sup>. The CARB Land Use Handbook recommends avoiding siting sensitive land uses (e.g., residences, schools, etc.) within 500 feet of a freeway.

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<sup>1</sup> "Special Report 17. Traffic-related air pollution: A critical review of the literature on emissions, exposure, and health effects". Health Effects Institute, May 2009; 394 p.

<sup>2</sup> "Effect of exposure to traffic on lung development from 10 to 18 years of age: a cohort study". Gauderman WJ et al., Lancet, February 2007; 369 (9561): 571-7.

<sup>3</sup> "Exposure to traffic and the onset of myocardial infarction". Peters A et al., The New England Journal of Medicine, 351(17):1721-1730

<sup>4</sup> Ritz B, et al. 2002 Ambient air pollution and risk of birth defects in Southern California. Am J Epidemiology, 155:17-25

<sup>5</sup> McConnell R, et al. 2006. Traffic, susceptibility, and childhood asthma. Environ Health Perspectives 114(5):766-72

<sup>6</sup> <http://www.arb.ca.gov/ch/handbook.pdf>

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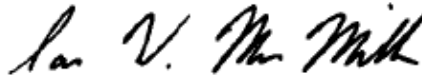
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Given these findings, SCAQMD staff strongly recommends that, prior to finalizing the CEQA process for this project, the lead agency evaluate the potentially significant impact of exposing sensitive receptors to these substantial pollutant concentrations. If these impacts are found to be significant, all feasible mitigation measures should be considered to reduce these impacts.

Please provide the SCAQMD with written responses to the above comments prior to the adoption of the Final MND. Further, 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

SBC100128-01  
Control Number