



South Coast  
Air Quality Management District

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

E-Mailed: February 23, 2011  
james.troyer@CityofRC.us

February 23, 2011

Mr. James Troyer  
Planning Director  
City of Rancho Cucamonga  
Planning Department  
P.O. Box 807  
Rancho Cucamonga, CA 91729

**Review of the Draft Mitigated Negative Declaration (MND) for the  
Development Review Case DRC2010-00348D**

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 revised or final CEQA 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 localized air quality analysis and greenhouse gas (GHG) emissions analysis for the project. Without quantifying localized air quality impacts and GHG emissions impacts the lead agency is unable to support its conclusion that the project will have less than significant air quality impacts. Therefore, AQMD staff requests that the lead agency revise the CEQA document to include a localized air quality analysis and GHG emissions analysis. In the event that the revised CEQA document demonstrates significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation pursuant to Section 15370 of the CEQA Guidelines.

AQMD staff is available to work with the lead agency to address these air quality 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](#)

SBC110128-05  
Control Number

### Localized Construction Emission Impacts

1. The proposed project site is across the street from a day care facility and a residential community (i.e., sensitive land uses), therefore, AQMD staff recommends that the lead agency calculate localized air quality impacts in addition to the regional air quality impacts analyzed in the air quality appendix of the MND. The results from the localized air quality analysis should then be compared to the localized significance thresholds (LSTs). The LSTs are used in conjunction with the recommended regional significance thresholds to indicate whether ambient air quality standards are exceeded locally when preparing a CEQA document. The AQMD staff recommends that the lead agency quantify localized impacts by using the LSTs developed by the AQMD for five acres of construction activity or less per day. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>.

### 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. Section 15064.4 of the CEQA guidelines requires that the lead agency “make a good faith effort” to quantify the GHG emissions impacts from the proposed project. Further, the technical information found in the air quality appendix of the MND provides the lead agency with adequate technical information (e.g., type of construction equipment, hours of equipment operation, material delivery trips and energy consumption) 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.

### Air Quality Mitigation Measures

3. In the event that the lead agency’s revised CEQA document requested in comments #1 and #2 demonstrates significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation pursuant to Section 15370 of the CEQA Guidelines that could minimize or eliminate these impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Also, a list of mitigation measures for criteria pollutants can be found on the AQMD’s CEQA webpage at the following web address: [www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.htm](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm) . Further, a list of mitigation measures to reduce GHG’s can be found at the California Air Pollution Control Officer’s Association Website at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>