



ClimatePlan

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RE: Improve Victoria/Walnut Ave Project - Request Not to Concur as a Project of Air Quality Concern

Dear Mr. Dorantes, Mr. Tavitias, and Mr. Morris,

Our organizations are contacting you today to urge you not to concur the Improve Victoria/Walnut Ave Project under consideration at the Southern California Association of Governments (SCAG) Transportation Conformity Working Group hearing on Tuesday, September 24th.

This project would widen Cherry Avenue in the City of Fontana in San Bernardino County by two additional lanes. This project claims that it would result in a decrease in the total truck ADT through various mitigation measures such as installing additional bike lanes and shared-use paths. However, the data submitted by the project developers as part of the PM2.5 Hot Spot Analysis shows the opposite. When looking at traffic data from the opening year, it becomes apparent that while the overall vehicle AADT is reduced in the build scenario, the truck AADT does increase. Additionally, examining the 2045 traffic data shows both truck and overall AADT increasing in the long term. Thus, this project fails to reduce congestion despite efforts to mitigate induced demand impacts, contributing to the worsening of local air quality and climate.

This project is requesting to be marked as not a Project of Air Quality Concern as it states it fails to meet any of the five criteria required. One of these criteria includes the requirement that the project cannot be located at a site that violates PM10 or PM2.5 air quality standards. While this project claims that is the case, maps available on the California Air Resources Board website show this project to be in the middle of a Federal PM2.5 nonattainment area. This project is also located in a Federal nonattainment area for Ozone standards, as well as the area of violation for the State PM 2.5, PM10, and Ozone standards. Additionally, the South Coast AQMD 2022 Air Quality Management Plan confirms that the South Coast Air Basin, where the project is located, is in serious nonattainment for annual and 24-hour PM2.5. Thus, the project fails to meet the aforementioned criteria and should be marked as a Project of Air Quality Concern.

This project will increase traffic and further pollute a region already struggling to achieve its air quality standards. Pollution generated by truck traffic can result in various cardiovascular diseases such as lung cancer, asthma, heart attacks, and even premature death. Since this project is located near a number of disadvantaged communities, our most vulnerable members will be the ones saddled with this burden of air pollution as a result of this project. Finally, failing to meet Clean Air Act standards can hinder our state's ability to build more transportation projects as it could result in federal sanctions and the loss of transportation funding. For these reasons, we urge you not to concur this project and help reduce the air pollution affecting the health and lives of Californians.

Sincerely,

Sofia Rafikova
Policy Advocate, Coalition for Clean Air

Marc Vukceвич
State Policy Director, Streets For All

David Diaz, MPH
Executive Director, Active San Gabriel Valley

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