June 9, 2014

Georgette Neale  
California Department of Transportation  
2379 Gateway Oaks Drive  
Suite 150  
Sacramento, CA 95833

Subject: **Rancho Cordova Parkway Interchange Project**  
**SCH# 2005092004**

Dear Ms. Neale:

Thank you for providing the Sacramento Metropolitan Air Quality Management District (District) with the opportunity to review the draft environmental impact report / environmental assessment (DEIR/EA) for this project. Staff comments follow. We have reviewed the project in a manner consistent with the California Health and Safety Code Section 40961 requirement that the District “represent all the citizens of the Sacramento District in influencing the decisions of other public and private agencies whose actions may have an adverse impact on air quality.”

**Multi-Modal Transportation**  
According to the DEIR/EA, the 2-lane Class I bicycle path and pedestrian connection, which the District advocated as an essential multi-modal connection across Highway 50, have been removed from the project. This removal affects the project’s consistency with applicable plans on multi-modal access and mobility. Consistency with these plans is a critical step in reducing motor vehicle air quality impacts.

The gap between the nearest bicycle connections across Highway 50 is approximately 2.5 miles, and this distance is a significant barrier to pedestrian and bicycle connectivity in the area. Removing the project’s multi-modal connection eliminates the choice of convenient pedestrian and bicycle access between Gold River and the neighborhoods, bicycle network, and other amenities south of Highway 50. It also leaves a barrier to bicycle and pedestrian access between Rancho Cordova neighborhoods and the American River Parkway along Gold River. These barriers impede active transportation between neighborhoods, and promote vehicle miles traveled and associated air pollutant emissions.

A Sacramento Regional Transit light rail station is proposed at Mine Shaft Lane, on Folsom Boulevard directly to the east of the interchange, and the project’s multi-modal facilities would allow the most feasible bicycle and pedestrian connection from Gold River to the station.
Rancho Cordova Parkway Interchange Project
Page 2 of 6

Removal of the facilities eliminates a quick, convenient potential for Gold River residents to walk or bike to the station.

We assume that the multi-modal connection removal was due to two primary Gold River community member concerns described on page xiii of the DEIR/EA. The first concern was that increased bicycle and pedestrian traffic would create security risks and would not be appropriate for neighborhood paths. The second concern was that light rail users might park in Gold River neighborhoods and use the pedestrian or bicycle routes to access to the light rail station.

As to the first concern, the DEIR/EA appears to indicate that bicycle activities associated with a multi-modal connection are not typically of a nature that causes substantial wear and tear of pavement materials, and that the effects of increased trail use would not be expected to be appreciably different from those resulting from the use of current bicycle/pedestrian routes on Coloma Road, Gold Express Drive, and Gold River Drive compared to conditions without construction of the facility (pp. 68, 81, and 414). As to the second concern, overflow parking could be a concern for any light rail station located near residential development, and does not outweigh the policy principles behind locating residential projects close to light rail and enhancing bike and pedestrian access. Fortunately, the parking overflow concern can be addressed by strict enforcement of residential parking restrictions. This leaves the connectivity in place both for existing and future residents as this area continues to grow, and enhances bike and light rail access for the area as a whole. Good transportation, community, and air quality planning requires that we provide connectivity between light rail stations and adjacent communities to encourage the use of light rail.

Since it is unlikely that the bicycle and pedestrian elements of the project would cause a new significant impact not already analyzed and mitigated in the DEIR/EA, adding this element back to the project description would not require recirculation of the DEIR/EA. The applicable planning goals, policies, and actions adopted to enhance multi-modal project elements are summarized below.

City of Rancho Cordova General Plan, Bicycle Master Plan, and Pedestrian Master Plan
The General Plan Air Quality Element includes the following policies that support including multi-modal facilities in the proposed project.

Goal AQ.3: Support multiple forms of transportation and a circulation system design that reduces vehicle trips and emissions.

Action AQ.3.1.2: Require all new development to be designed to enable easy pedestrian and bicycle access and circulation.

The Circulation Element specifically addresses providing multi-modal facilities near transit.

Policy C.2.2: Require bicycle and pedestrian connections to public transit systems at stops, stations, and terminals
 Rancho Cordova Parkway Interchange Project
Page 3 of 6

Action C.2.5.3: Develop projects and secure funding to improve pedestrian and bicycle safety and access around schools and transit stations.

Additionally, Action C.2.5.5 of Rancho Cordova’s General Plan, directs city departments to coordinate with stakeholders including the regional air district “in order to design, implement, and maintain the proposed bikeway system.”

The Bicycle Master Plan also contains policies that support bicycle connectivity. This includes encouraging development projects that make bicycling a convenient and desirable form of transportation, with a mix of land uses and safe bicycle network connections (Policy 2.2). Likewise, the Pedestrian Master Plan includes policies to eliminate Highway 50 as a barrier to pedestrian travel (Policy 1.2), and work with transit providers to develop pedestrian connections to transit stops (Policy 1.5).

Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan and Sustainable Communities Strategy (MTP/SCS), and Regional Local Funding Program
The SACOG MTP/SCS contains policies to encourage local governments to grow consistent with Blueprint Principles, including transportation choices. Likewise, the SACOG Regional Local Funding Program requires that any project it funds be consistent with complete streets requirements.

Other Applicable Plans
The Sacramento County General Plan Circulation Element contains policies that stipulate multi-modal connections between neighborhoods and amenities, particularly light rail (Policies CI-32, CI-36, and associated Goal; Policy CI-46). The Air Quality Element contains a policy to “promote pedestrian/bicycle access and circulation to encourage community residents to use alternative modes of transportation to conserve air quality and minimize direct and indirect emission of air contaminants” (Policy AQ-1). Sacramento Regional Transit’s Regional Transit Master Plan also stresses the importance of bicycle and pedestrian access to stations, and incorporates the assumption of bicycle and pedestrian access to stations into planning scenarios.

All of these policies, if implemented, contribute to improving air quality by reducing vehicle related emissions. The multi-modal connection originally included in the project could help achieve motor vehicle emissions reductions and was consistent with the applicable plans and policies referenced above; conversely the decision to remove the multi-modal component does not achieve emissions reductions and is inconsistent with these plan policies. The DEIR/EA does not address whether or not the removal of the multi-modal connection is consistent with applicable bicycle and pedestrian policies.

Mobile Source Air Toxics
The DEIR/EA discusses mobile source air toxics (MSATs) from the federal perspective only, highlighting the Federal Highway Administration’s (FHWA) position that appropriate technical tools do not exist for adequately quantifying near-roadway health risk. We recommend expanding this section to include a discussion of near-roadway health risk quantification practices in California, which are commonly performed to satisfy the California Environmental Quality Act’s (CEQA) requirement that environmental impacts be identified, assessed, and
avoided or mitigated (as possible) if significant. Please refer to the California Air Pollution Control Officers Association’s (CAPCOA) Health Risk Assessments for Proposed Land Use Projects guidance document, which provides step-by-step guidance on near-roadway risk characterization for CEQA purposes including emissions modeling, dispersion modeling, exposure modeling, and determination of cancer risk due to diesel particulate matter. The methodology focuses on diesel particulate matter, since the cancer risk posed by this pollutant is more significant than the other carcinogenic MSATs. While we understand that modeling may not thoroughly characterize all the health risk associated with nearby exposure to traffic generated pollutants, state and local protocols such as CAPCOA’s help to inform the public and decision makers about the relative risks posed by a project.

Construction
The following comments pertain to the air quality analysis for construction of the project.

1. The analysis was conducted in 2010, and used an older version of the Road Construction Emissions Model (RCEM) v6.3.2. The most current version of the RCEM is v7.1.5.1, which was released in December 2013.

2. The District recommends including all air quality modeling in the final environmental document to fully disclose the analysis. The RCEM and air dispersion model (ISCST3) runs were not included in the DEIR/EA. Although we obtained a copy of the RCEM, we have been unable to review the ISCST3. Consequently, we cannot fully assess the adequacy of the analyses.

3. Mitigation measure 3.2.11-2 contains language that pre-1996 off-road vehicles or equipment shall be fueled with emulsified fuel. This measure is outdated because the fuel is not generally available.

4. The District appreciates the inclusion of its recommended enhanced exhaust control practices to reduce construction NOx emissions. Unfortunately, the 20% NOx reduction does not mitigate emissions to below the 85 pounds/day threshold of significance, as noted in the DEIR/EA.

The DEIR/EA includes discussion of an estimated mitigation fee for worst case construction emissions in the amount of $503,000, but concludes that payment of the fee is not considered reasonable or feasible. The overall project cost is estimated at over $80 million, and the mitigation fee is a very small part (0.63%) of the project budget. To date, no other environmental review for a comparable project in the region has identified construction mitigation fees as infeasible mitigation (see table below).
Rancho Cordova Parkway Interchange Project
Page 5 of 6

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Jurisdiction</th>
<th>Estimated Project Cost</th>
<th>AQ Mitigation fee in MND/EIR</th>
<th>% Mitigation fee in MND/EIR to Project cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>International Drive Extension</td>
<td>City of Rancho Cordova</td>
<td>$16,800,000</td>
<td>$16,781.00</td>
<td>0.10%</td>
</tr>
<tr>
<td>Watt Avenue Hwy 50 Interchange Improvements</td>
<td>County of Sacramento</td>
<td>$22,600,000</td>
<td>$6,880.00</td>
<td>0.03%</td>
</tr>
<tr>
<td>Highway 99 Elverta Road Interchange</td>
<td>County of Sacramento</td>
<td>$30,000,000</td>
<td>$30,795.00</td>
<td>0.10%</td>
</tr>
<tr>
<td>Central Galt Interchange</td>
<td>City of Galt</td>
<td>$50,600,000</td>
<td>$15,341.00</td>
<td>0.33%</td>
</tr>
<tr>
<td>Sheldon Road Highway 99 Interchange</td>
<td>City of Elk Grove</td>
<td>$36,000,000</td>
<td>$8,168.00</td>
<td>0.02%</td>
</tr>
<tr>
<td>Folsom Lake Crossing (bridge)</td>
<td>Army Corps</td>
<td>$73,294,000</td>
<td>$82,651.00</td>
<td>0.11%</td>
</tr>
<tr>
<td>I-5 Cosumnes River Boulevard Extension and Interchange</td>
<td>City of Sacramento</td>
<td>$83,000,000</td>
<td>$265,888.00</td>
<td>0.32%</td>
</tr>
</tbody>
</table>

Please note that the mitigation fee is an estimate. Project emissions are often recalculated prior to the start of construction using project specific equipment and actual construction schedule by the City of Rancho Cordova in coordination with the District. In our experience, actual fees are often lower than the initial estimate used in the EIR. The District recommends that a fee be included as mitigation for the project construction air quality impacts with aided language on recalculating the mitigation fee.

Additionally, the City of Rancho Cordova’s General Plan contains goals, policies and actions that support full mitigation of the construction emissions impact resulting from the project:

Action AQ.1.2.1 - Coordinate with SMAQMD through the environmental review process to ensure that proposed projects would not significantly affect the region’s ability to meet state and federal air quality standards.

Policy AQ.4.3 - Support SMAQMD’s program of retrofitting construction equipment to reduce air pollution.

Action AQ.4.3.1 - Enforce construction-related air quality mitigation measures adopted through the CEQA process.

Mitigating construction impacts is critical to achieving state and federal ozone standards. Consequently, the failure to fully mitigate construction NOx emissions from the project will contribute to emissions levels in the area that could cause additional exceedances and ultimately could negatively impact our federal transportation funding eligibility in the future.

The mitigation fees are used by the District to fund a variety of emission reduction strategies. NOx, VOC and PM emission reduction programs include replacement of older construction equipment with newer models, replacement of older on-road-heavy-duty trucks with newer trucks, replacement of wood-burning fireplaces with EPA-rated natural gas and wood-burning fireplace inserts, and enforcement of wood-burning prohibitions.

5. The District recommends that all construction projects include basic emission control measures. We also recommend that projects implement enhanced fugitive dust control practices, if they result in PM10 emissions that will exceed or contribute to the District’s concentration-based threshold for PM10. Both the basic and enhanced measures are attached for your reference and inclusion in the project.
Thank you for your attention to our concerns. If you have questions about these comments, please contact me or District staff member Molly Wright. My contact information is lgreene@airquality.org or (916) 874-4800, and Molly’s contact information is mwright@airquality.org or (916) 874-4207.

Sincerely,

[Signature]

Larry F. Greene
Executive Director
Sacramento Metropolitan Air Quality Management District

Attachments (2)

Cc: Larry Robinson, Program Coordinator, SMAQMD
**ENHANCED FUGITIVE PM DUST CONTROL PRACTICES**

**SOIL DISTURBANCE AREAS**

- Water exposed soil with adequate frequency for continued moist soil. However, do not overwater to the extent that sediment flows off the site.
- Suspend excavation, grading, and/or demolition activity when wind speeds exceed 20 mph.
- Install wind breaks (e.g., plant trees, solid fencing) on windward side(s) of construction areas.
- Plant vegetative ground cover (fast-germinating native grass seed) in disturbed areas as soon as possible. Water appropriately until vegetation is established.

**UNPAVED ROADS (ENTRAINED ROAD DUST)**

- Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site.
- Treat site accesses to a distance of 100 feet from the paved road with a 6 to 12-inch layer of wood chips, mulch, or gravel to reduce generation of road dust and road dust carryout onto public roads.
- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The phone number of the District shall also be visible to ensure compliance.
BASIC CONSTRUCTION EMISSION CONTROL PRACTICES

The following practices are considered feasible for controlling fugitive dust from a construction site. Control of fugitive dust is required by District Rule 403 and enforced by District staff.

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

The following practices describe exhaust emission control from diesel powered fleets working at a construction site. California regulations limit idling from both on-road and off-road diesel powered equipment. The California Air Resources Board enforces the idling limitations.

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.

Although not required by local or state regulation, many construction companies have equipment inspection and maintenance programs to ensure work and fuel efficiencies.

- Maintain all construction equipment in proper working condition according to manufacturer’s specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

Lead agencies may add these emission control practices as Conditions of Approval (COA) or include in a Mitigation Monitoring and Reporting Program (MMRP).