September 2, 2014

Paul Junker and Cyrus Abhar
City of Rancho Cordova
2729 Prospect Park Drive
Rancho Cordova, California 95670

RE: Arista del Sol (RC-04-04-077/SAC200400129)

Mr. Junker and Mr. Abhar,

The Sacramento Metropolitan Air Quality Management District (SMAQMD) thanks the City of Rancho Cordova for the opportunity to evaluate the Arista del Sol rezone and subdivision map amendments, to be heard at City Council on September 2, 2014. We offer the following comments.

The proposed project reduces units from 905 single family lots to 740 single family lots. This reduces density per acre, even after considering the wetland preserve addition. Multiple SunRidge map amendments that reduce density have been submitted in recent months, in addition to this project. Reduced density is associated with higher vehicle miles traveled, and reduced pedestrian access and mobility. Cumulative reductions in density could seriously compromise the area’s walkability and specific plan vision for pedestrian oriented neighborhoods, and result in vehicle miles traveled above those projected in the environmental document traffic study. If this seeming trend of reducing project level residential density continues, it could potentially undermine the basis for the SunRidge air quality mitigation plan’s (AQMP’s) finding of technical adequacy.

According to the staff report, further environmental review is not required for the project. The attached “CEQA Addendum” analyzes project motor vehicle accommodation. Please note that the Governor’s Office of Planning and Research has proposed guidelines to update CEQA transportation impacts analysis. Analysis criteria in the proposed guidelines include vehicle miles traveled per capita, pedestrian / bicycle connectivity and other considerations. Under the guidelines, a project vehicle miles traveled that is greater than the regional average for the land use type may indicate a
significant impact. The criteria would specifically apply to projects located within one-half mile of major transit stops or high quality transit corridors. Please note that reduced densities could seriously compromise the project’s ability to accommodate future transit.

**Americanos Boulevard / Circulation**
Cross-sections for Americanos Boulevard depict portions where there is no sidewalk / trail along the community park frontage. Cross-sections for Chrysanthy also show sidewalk only on one side. A complete street with active transportation infrastructure on both sides of the streets will support the SunRidge Specific Plan’s concept of walkable neighborhoods organized around activity centers including parks and neighborhood commercial centers. The SunRidge Specific Plan street cross-sections show 6-foot sidewalks on both sides of collector and arterial streets.

Additionally, Sunridge’s AQMP requires a clean-fuel transit shuttle system. Providing frontage on both sides of Americanos Boulevard would give transit planners the greatest flexibility to maximize ridership. Transit stops cannot be located where no sidewalk improvements exist, due to Americans with Disabilities Act (ADA) requirements. Transit service is often organized to accommodate round-trips, and this usually requires improvements on both sides of transit route streets.

Further, improvements adjacent to the wetlands preserve have strong potential to be a pedestrian asset, even when development is located on the other side of the street. The Folsom Boulevard Streetscape project experiences high pedestrian traffic along the railroad tracks and across the street from major destinations, demonstrating that well-designed pedestrian infrastructure can experience high use even when it is across the street from destinations. The Folsom Boulevard Streetscape project demonstrates the demand for complete active transportation infrastructure, and we encourage the City to continue to accommodate this demand.

Related to circulation, the wetland preserve limits connectivity to Grant Line Road. We understand from staff communications that additional connectivity will be provided to Grant Line Road in subdivisions to the north of the project, where they are not limited by the wetland preserve. Maintaining connectivity through to Grant Line Road will support the AQMP connectivity mitigation measure.

Finally, please remember that adding cul-de-sacs to subdivisions will impact compliance with the AQMP pedestrian connectivity mitigation measure. If the cul-de-sac development pattern continues, the project could be out of compliance with the AQMP connectivity mitigation measure.
General Comments
All projects are subject to SMAQMD rules and regulations in effect at the time of construction. The attached document describes SMAQMD Rules which may apply to this project whether the air quality impacts are determined to be significant or not.

The SMAQMD thanks the City of Rancho Cordova for the opportunity to comment on this project. If you have additional questions or require further assistance, please contact me at mwright@airquality.org or 916-874-4207

Sincerely,

Molly Wright
Air Quality Planner / Analyst

Cc: Larry Greene, Air Pollution Control Officer, SMAQMD
Larry Robinson, Program Coordinator, SMAQMD
SMAQMD Rules & Regulations Statement (revised 3/12)

The following statement is recommended as standard condition of approval or construction document language for all development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):

All projects are subject to SMAQMD rules in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the SMAQMD early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower are required to have a SMAQMD permit or a California Air Resources Board portable equipment registration. Other general types of uses that require a permit include, but are not limited to dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earth moving activities, storage or any other construction activity to prevent airborne dust from leaving the project site.

Rule 414: Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 BTU PER Hour. The developer or contractor is required to install water heaters (including residence water heaters), boilers or process heaters that comply with the emission limits specified in the rule.

Rule 417: Wood Burning Appliances. This rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

Rule 442: Architectural Coatings. The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

Rule 460: Adhesives and Sealants. The developer or contractor is required to use adhesives and sealants that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

Naturally Occurring Asbestos: The developer or contractor is required to notify SMAQMD of earth moving projects, greater than 1 acre in size in areas “Moderately Likely to Contain Asbestos” within eastern Sacramento County. Asbestos Airborne Toxic Control Measures, Section 93105 & 93106 contain specific requirements for surveying, notification, and handling soil that contains naturally occurring asbestos.