September 29, 2014

Jessica Jordan
City of Rancho Cordova
2729 Prospect Park Drive
Rancho Cordova, California 95670

RE: Grant Line 208 Rezone, Subdivision Map, Development Agreement Amendment

Dear Ms. Jordan,

The Sacramento Metropolitan Air Quality Management District (SMAQMD) thanks the City of Rancho Cordova for the opportunity to evaluate the Grant Line 208 rezone, subdivision map, and development agreement amendment. We offer the following comments on project residential densities, connectivity, and the status of the SunRidge Specific Plan air quality mitigation plan (AQMP). Our comments support the SunRidge Specific Plan’s concept of walkable neighborhoods organized around activity centers including parks and neighborhood commercial centers, with a circulation approach that emphasizes pedestrian and bicycle systems and public transit.

Residential Density
The proposed project reduces units from 724 single family lots to 506 dwelling units. 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.

Circulation
The wetland preserve addition limits connectivity to Grant Line Road. A map proposed for this project in April 2014 included street connectivity to Grant Line Road, just north of the wetland preserve. The current map does not include this street connectivity, and

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instead replaces it with a pedestrian paseo. To support the AQMP connectivity mitigation measure, this paseo must be designed to provide adequate bicycle and pedestrian connectivity.

Additionally, please remember that adding cul-de-sacs to subdivisions will impact compliance with the AQMP connectivity mitigation measure. The current map includes two additional cul-de-sacs, but they end on a greenway, so they have the potential to leave pedestrian connectivity intact. The street cross-sections do not make clear what the greenway design will be, or how the cul-de-sacs will end there. To support the AQMP pedestrian connectivity mitigation measure, these cul-de-sacs must provide pedestrian connectivity through the greenway.

Street Cross-Sections
We commend the narrowed lane widths, of 9 feet or less, on some of the residential street cross sections. Narrowed street widths can calm traffic, creating safer pedestrian conditions. Ensuring that sidewalks are at least 5 feet wide on either side would further support pedestrian travel.

Cross-sections for Americanos Boulevard depict portions where there is no sidewalk / trail along the community park frontage. 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, the AQMP calls for 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.

Finally, the cross-section for Grant Line Road does not provide detail on the traffic lanes configuration, so it is difficult to evaluate. To support walkability, Grant Line improvements must consider walkable connections to any future development occurring to the east. Also note that the 4-foot bicycle lane shown is narrower than the 5-foot lanes depicted in the SunRidge Specific Plan.

SunRidge Specific Plan AQMP
Ongoing connectivity and residential density reductions could affect AQMP technical adequacy. District and City staffs have discussed replacing obsolete AQMP measures in the SunRidge Specific Plan. We recommend that this process include a review of measures to ensure development patterns that support pedestrian access and mobility
and reduced vehicle miles traveled. District staff will contact City staff about this process in the coming weeks.

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. 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

Attachment: SMAQMD Rules and Regulations Statement

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.