January 26, 2015

SENT VIA E-MAIL ONLY

Mr. Brian Mulvey
U.S. Army Corp of Engineers, Sacramento District
1325 J Street
Sacramento, CA 95814-2992

Sacramento River Bank Protection Project Phase II Supplemental Authority
Draft Environmental Impact Statement/Environmental Impact Report (SAC201501530)

Dear Mr. Mulvey:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) reviewed the Sacramento River Bank Protection Project (SRBPP) Phase II Supplemental Authority Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR). The SRBPP Phase II includes 80,000 linear feet of levee improvements that will be conducted over a 10 year period. Actual projects will be selected each year for implementation; therefore subsequent environmental documents for projects selected will tier from this programmatic EIS/EIR. Staff comments on the EIS/EIR follow.

1. Correct SMAQMD’s attainment status for the federal PM10 standard (page 8-15). SMAQMD attains this standard. The SMAQMD’s webpage provides the details on the PM10 redesignation.
2. AQ-1 and AQ-MM-1b assume NOx can be mitigated to net zero if the general conformity deminimis is exceeded but the other air pollutants cannot. Clarify why the other pollutants aren’t treated in the same manner as NOx.
3. SMAQMD modified its enhanced exhaust control practices to make them more easily understandable. Consider replacing the control practices in the document with the most current control practices, or reference to check the SMAQMD’s website for the most current control practices available at the time a project is being considered for construction.
4. Off-site mitigation fees are a feasible option to reduce emissions if onsite mitigation does not reduce the emissions below the SMAQMD thresholds of significance. Chapter 3 of the SMAQMD’s CEQA Guide describes the off-site mitigation fee in more detail. Mitigation fees should be added to SMAQMD mitigation measures in Appendix D.
5. Clarify that SMAQMD adopted GHG significance thresholds in October 2014 that can be used in subsequent environmental documents for projects being implemented through the SRBPP.
6. All projects are subject to applicable SMAQMD rules in affect at the time of construction. A list of the most common rules that apply to construction projects is attached for your convenience. SMAQMD rules can be obtained on the SMAQMD’s webpage: www.airquality.org.
If you have any questions regarding these comments please contact me at (916) 874-4881 or khuss@airquality.org. I’d like to be included on the mailing list or distribution for all future information on the SRBPP.

Sincerely,

Karen Huss
Associate Air Quality Planner/Analyst

Attachment

Cc: Larry Robinson, SMAQMD
    Kip Young, CVFPB
ATTACHMENT - 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.