



May 14, 2007

Sent Via Email

Dana Allen, Senior Planner  
Environmental Planning Services  
City of Sacramento  
2101 Arena Blvd, 2<sup>nd</sup> Floor  
Sacramento, CA 95834

**RE: Notice of Preparation for an Environmental Impact Report (EIR) for the Delta Shores Project (P06-197)**

Dear Ms. Allen:

Thank you for the opportunity for the Sacramento Metropolitan Air Quality Management District to review and comment on the above referenced project. Staff comments are as follows:

1. The City may wish to include a discussion of climate change. This is an issue that has gained a great deal of attention recently. As you know, on September 27, 2006, the State of California passed into law AB32, the Global Warming Solutions Act of 2006, which requires the State to reduce its carbon emissions by approximately 25% by the year 2020. In addition, California Attorney General Bill Lockyer raised the issue of global warming in his comment letter (3/20/06) on the Orange County Transportation Authority's 2006 Long-Range Transportation Plan Draft Program EIR. This precedent-setting letter pointed out that one of the most important environmental impacts of vehicle emissions is greenhouse gases (GHG) and the resulting climate change. In addition to transportation sources, greenhouse gases are also generated by industry and agricultural activities.

The major anthropogenic greenhouse gases are carbon dioxide, methane, and nitrous oxide; however, neither the District, state, nor federal government have specific thresholds of significance for project-related greenhouse gases which makes project specific discussions of the cumulative impacts to global warming problematic. Over time, we expect the scientific community to develop more tools to help analyze and effectively mitigate greenhouse gases. In the meantime, the next version of the soon to be released URBEMIS Model will include CO<sup>2</sup> emissions estimates for land use projects, and the District's revised Guidance for Land Use Emissions Reductions includes information on mitigation options for development projects. District staff will be happy to provide information on other resources as we become aware of them.

2. In 2005, the California Air Resources Board (CARB) adopted the *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB Handbook), which provides guidance to local planners and decision-makers about land use compatibility issues; particularly, the siting of residential uses within 500 feet of freeways and major roadways. In order to provide further guidance on the CARB Handbook, the District's Board of Directors endorsed the *Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways* (Protocol) in 2007. The Protocol assists local land use jurisdictions in assessing and disclosing potential cancer risk due to diesel particulate matter. Given the proximity to Interstate 5, it is likely that there are portions of Delta Shores where the Protocol will be of use. The Protocol can be found at  
<http://www.airquality.org/ceqa/SLUMajorRoadway/SLURecommendedProtocolJan2007.pdf>

3. The size of this project suggests it will likely generate both short term (construction) and long term (operational) air quality impacts which may exceed SMAQMD adopted CEQA thresholds. However, an air quality analysis should be done to verify significance of all impacts. If the project is determined to be significant for construction we recommend our standard Construction Mitigation measure which can be found at [www.airquality.org](http://www.airquality.org). Additionally if it is determined that the project is operationally significant we recommend that City staff and the proponent work with District staff to develop and Air Quality Mitigation Plan for this project to be included in the draft EIR. Early consideration of operational mitigation will allow mitigation related to design elements in particular to be developed before design plans are finalized.
4. Excellent bicycle, pedestrian and vehicular connectivity is important as this project is situated adjacent to existing neighborhoods. Designing bicycle and pedestrian features that allow good, safe access for new and existing residents to schools, parks, and commercial uses is very important. Additionally it is important wherever possible, to create opportunities to connect Delta Shores with non-vehicular access to the proposed Regional Transit South Line extension.

In addition, this project is subject to all applicable District rules and regulations (see attachment) in effect at the time of construction. Information regarding all District rules can be obtained at [www.airquality.org](http://www.airquality.org) or by calling the Compliance Assistance Hotline at (916) 874-4884.

If there are any questions regarding these comments please contact me at (916) 874-4883 or [cmcghee@airquality.org](mailto:cmcghee@airquality.org).

Sincerely,



Charlene McGhee  
Associate Air Quality Analyst

- c: Tom Karvonen, Senior Project Manager, SunCal Companies  
Scott A. McPherson, Managing Director, Merlone Geier Partners  
Larry Robinson, Program Coordinator, Sacramento Metropolitan AQMD

## **SMAQMD Rules & Regulations Statement** (revised 1/07)

*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 and regulations in effect at the time of construction. A complete listing of current rules is available at [www.airquality.org](http://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 District 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.

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

**Rule 417: Wood Burning Appliances.** Effective October 26, 2007, 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 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.

Other general types of uses that require a permit include dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.