



February 2, 2001

Peter Brundage
Sacramento Local Agency Formation Commission
700 H Street, Room 7650
Sacramento CA 95814

RE: Revised Folsom Sphere of Influence Amendment (SOIA) FEIR (December, 2000)

Dear Mr. Brundage:

Thank you for your consideration of the District's previous comments regarding the SOIA. We appreciate LAFCo's efforts to revise the air quality analysis and improve air quality mitigation. We offer the following comments to help clarify the additional construction and operational mitigation included in Section C of the Revised FEIR.

Mitigation Measure 4.5-1

Although the mitigation measure, as written, is consistent with the District's previous recommendation, we have revised the recommended construction mitigation to simplify contractor compliance procedures while maintaining a feasible emission reduction standard. We therefore recommend that LAFCo replace Mitigation Measure 4.5-1 with the attached "SMAQMD Recommended Mitigation for Reducing Emissions from Heavy-Duty Construction Vehicles".

Mitigation Measure 4.5-2

This mitigation measure establishes that "the total effectiveness of the Air Quality Plan adopted for the SOIA will match those recently adopted for other developing areas within Sacramento County, such as North Natomas". The measure continues that North Natomas projects are required to achieve an overall emission reduction of 35 percent. We recommend that the measure simply establish a performance standard of 35 percent emission reduction, without reference to requirements that may be adopted for other projects. Without such clarification, the emission benefit of this measure would be unknown due to potentially varying mitigation standards applied at the project level throughout Sacramento County.

Thank you again for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Christensen".

Peter Christensen
Associate Air Quality Planner

c: Gail Furness de Pardo, City of Folsom

RECOMMENDED MITIGATION FOR REDUCING EMISSIONS FROM HEAVY-DUTY CONSTRUCTION VEHICLES

Revised January 24, 2001

Category 1: Reducing NOx emissions from off-road diesel powered equipment

The prime contractor shall provide a plan for approval by [DERA, City of x, SMAQMD, etc.] demonstrating that the heavy-duty (> 50 horsepower) off-road vehicles to be used in the construction project, and operated by either the prime contractor or any subcontractor, will achieve a fleet-averaged 20 percent NOx reduction and 45 percent particulate reduction compared to the most recent CARB fleet average; and

The prime contractor shall submit [to DERA, City of x, SMAQMD, etc.] a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during the construction project. The inventory shall include the horsepower rating, engine production year, and hours of use or fuel throughput for each piece of equipment. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs.

and:

Category 2: Controlling visible emissions from off-road diesel powered equipment

The prime contractor shall ensure that emissions from all off-road diesel powered equipment used on the project site do not exceed 40 percent opacity for more than three minutes in any one hour. Any equipment found to exceed 40 percent opacity shall be repaired immediately, and [DERA, City of x, SMAQMD, etc.] shall be notified within 48 hours of identification of non-compliant equipment. A visual survey of all in-operation equipment shall be made at least weekly, and a monthly summary of the visual survey results shall be submitted throughout the duration of the project, except that the monthly summary shall not be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles surveyed as well as the dates of each survey. The SMAQMD and/or other officials may conduct periodic site inspections to determine compliance. Nothing in this section shall supercede other SMAQMD or state rules or regulations.