

December 15, 2006

William Campbell
City of Rancho Cordova
2729 Prospect Park Drive
Rancho Cordova, CA 95670

RE: Heritage Falls General Plan Amendment/Rezone/Tentative Tract Map/Special Development Permit
SMAQMD reference number: SAC200601081

Dear Mr. Campbell:

Thank you for providing the Heritage Falls project to the Sacramento Metropolitan Air Quality Management District (District) for review. District staff comments follow.

1. A project of this size may exceed adopted CEQA thresholds for short term (construction) and air quality impacts. An air quality analysis should be done, as part of any environmental review, to determine the significance of all impacts. We recommend the use of URBEMIS 2002 v.8.7, which is available for download at www.urbemis.com. If it is determined that construction impacts are significant we recommend our standard construction mitigation be applied to the project. A copy of the standard mitigation can be found at www.airquality.org. If operational impacts are analyzed to be in excess of the threshold, an Air Quality plan should be prepared for the project. If needed, the applicant is welcome to contact the District for assistance with preparation of the Plan.
2. Given the proximity of the project to existing and planned subdivisions in the Grantline area, every effort should be made to provide good access for both pedestrians and bicyclists. The site design, as laid out in the tentative subdivision map, severely lacks pedestrian, bicycle, and pedestrian interconnectivity to communities and amenities outside the project site. The District recommends that the project design significantly increase the number of pedestrian/bicycle access points along the northern and western boundaries of the project. We also encourage the proponent to conduct a pedestrian circulation audit to determine ways to maximize pedestrian mobility within the project site, and to maximize the project's function as a pedestrian thoroughfare between the the site and other surrounding planning areas.
3. The tentative subdivision map depicts several "private" communities in the northern and eastern sections of the project site. "Private" communities typically feature access restrictions that prevent the public from traveling into, and through, the community. The District is concerned that these access restrictions will create significant barriers to bicyclists or pedestrians attempting to travel to or beyond the northern and eastern borders of the project site. If these communities are to have restricted access, the District recommends the site plan designate safe and convenient, **public** pedestrian and bicycle routes through these communities to ensure that they do not become barriers to users of these transportation modes.
4. The District recommends that the project design include rights of way, pathways, and other facilities necessary to ensure that the residents of these communities have safe and convenient access to future Bus Rapid transit or other transit services that may come to Grantline or White Rock road.

5. The General plan vision for the Grant Line West Planning area included a recommendation that this planning area be developed with "up to two on-site village centers in the northern and southern portions of the Planning Area." The District recommends that the plan be altered to include land zoned for one or two neighborhood-serving retail locations with the goal of bringing convenience services to the residents.
6. The District recommends that the portions of the project along Grantline road be "upzoned" to a higher density maximum density that would be more supportive of future transit services along this roadway.
7. This project will also be subject to specific District rules, including but not necessarily limited to the rules listed on the sheet attached and information on all other District rules can be found at the district website <www.airquality.org> or by calling the Compliance Hotline at (916) 874-4884.

Please contact me with any questions regarding these comments at (916) 874-2694 or at jhurley@airquality.org .

Sincerely,

Joseph J Hurley
Assistant Air Quality Analyst/Planner

Attachment

C: Larry Robinson, SMAQMD

SMAQMD Rules & Regulations Statement

*The following statement is recommended as standard condition of approval or construction document language for **all** construction 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 or by calling 916.874.4800. Specific rules that may relate to construction activities 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 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.