

April 28, 2006

Ms. Grace Hovey
City of Sacramento
Development Services Department
2101 Arena Boulevard, Second Floor
Sacramento, CA 95834

**RE: Interstate 5/Cosumnes River Boulevard Interchange Project Draft
Environmental Impact Statement/Environmental Impact Report; SCH:
2002022072
SMAQMD # SAC200200446**

Dear Ms. Hovey:

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

1. As stated on page 3-186 construction emissions are identified as being in excess of the SMAQMD approved CEQA threshold of 85 pounds per day for NOx and the construction "regulatory requirement" and associated fee are included as part of the project; however, without the entire Road Construction Model run being included in this document we are unable to determine if both the roadway and the interchange are included in the analysis. As a result we are not able to adequately evaluate the air quality analysis or the associated fee calculation for the construction phase of the project.
2. There appears to be a contradiction in the document related to the construction impacts and mitigation. In Table S-1, AQ-1 identifies construction related emissions as an impact, yet on page 3-186, Section 3.22 requirements to reduce construction emissions are said to be "...incorporated into the project design and will be included in all construction documents...". It seems that if these "requirements" are to be included as part of the project design, along with the fee to mitigate the emissions remaining over the threshold, that those emissions should no longer represent an impact. If, on the other hand, the construction emissions do represent an impact than CEQA requires that mitigation be included in the Mitigation Monitoring and Reporting Program.
3. Notwithstanding the conformity finding for the Metropolitan Transportation Plan, of which this project is a part, there is no analysis provided to illustrate the operational impacts of this project and related mitigation required by CEQA, if available. The approved CEQA threshold for operational emissions is 65 pounds per day of ROG or NOx.

4. Bicycle and pedestrian access at the proposed railroad crossing appears to be only included on one side of the street. Instead, in order to avoid conflicts with motor vehicle traffic by forcing some cyclists to go the wrong way, accommodations for cyclists should be included in both directions at the railroad crossing.
5. Strong consideration should be given to design features that assist pedestrians in crossing at the major intersections that will be created by the proposed project. Such features as pedestrian refuge islands and countdown timers at crosswalks
6. This project will also be subject to any and all District rules that are applicable at the time of construction, including but not necessarily limited to those identified on the sheet attached, additional information on these and all other District rules can be found at www.airquality.org or by calling the Compliance Hotline at (916) 874-4884.

Please contact me with any questions you may have regarding these comments at (916) 874-4883 or cmcghee@airquality.org.

Sincerely,

Charlene McGhee
Associate Air Quality Analyst

Attachment

c: Larry Robinson, SMAQMD