

March 10, 2010

Tom Zlotkowski, Executive Director
10640 Mather Blvd, Suite 120
Mather, CA 95655
info@ConnectorJPA.net

Subject: Notice of Preparation of a Program EIR for the Capital SouthEast Connector Project (SAC200801218)

Dear Mr. Zlotkowski,

Thank you for giving the Sacramento Metropolitan Air Quality Management District (SMAQMD) the opportunity to comment on the project known as the Capital Southeast Connector (Connector). The SMAQMD has the following comments on the Notice of Preparation of the Program Environmental Impact Report:

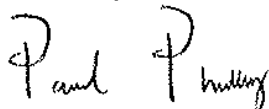
- The project may result in cumulatively significant greenhouse gas (GHG) emissions during both construction and operation. Include a climate change analysis consistent with SMAQMD's GHG guidance which recommends a discussion of the regulatory framework of GHG emissions, identifying a threshold of significance, making a determination of significance based on that framework and providing an analysis of construction and operation emissions resulting from the project. Mitigation measures to address significant GHG emissions must also be included. The GHG chapter of the SMAQMD's CEQA Guide is available at <http://www.airquality.org/ceqa/cequguideupdate/Ch6ghgFINAL.pdf>.
- The project may induce travel as well as prematurely direct regional growth to areas with higher vehicle miles traveled per household (VMT/HH) than the regional average. Investigate the Connector's impacts to anticipated VMT/HH on proposed projects in the corridor, including but not limited to, Grantline East, Cordova Hills, Rio del Oro, Folsom South of 50 Specific Plan, Arboretum and other Sunrise-Douglas Plans, New Bridge, Vineyard Springs, Laguna Ridge and East Franklin Specific Plan.
- Alternatives 3 and 4 include an off-corridor multi-use path adjacent to Highway 50. Use the SMAQMD's roadway protocol to determine if there is a health risk to locating the trail there and incorporate mitigation to reduce exposure to particulate matter (including diesel exhaust), such as increasing buffer distances

or planting evergreen trees such as deodar cedar. The protocol is available at <http://www.airquality.org/ceqa/RoadwayProtocol>.

- The project may result in increased particulate matter emissions and adverse health effects on local sensitive receptors. There are also several mining projects have been proposed southeast of the Connector (Teichert Quarry, Granite Walltown Quarry, DeSilva Gates Quarry) and heavy-duty traffic from these projects may utilize the corridor. Disclose the expected traffic, expected mix of light-duty and heavy-duty vehicles, and utilize SMAQMD's roadway protocol to determine if there is a health risk to current and future sensitive receptors and incorporate mitigation, such as increasing buffer distances or planting evergreen trees such as deodar cedar.
- Determine if the future urban and suburban segments of the Connector are compliant with the Sacramento Transportation & Air Quality Collaborative's Best Practices for Complete Streets, available at <http://www.completestreets.org/webdocs/resources/cs-bestpractices-sacramento.pdf>.
- Because of its size, this project may exceed of SMAQMD's adopted construction NO_x threshold of 85 lbs/day. The environmental document should analyze these emissions using our Roadway Construction Emissions Model, and include the SMAQMD's standard mitigation measures if necessary. The model and mitigation can be found at <http://www.airquality.org/ceqa/index.shtml>.

SMAQMD staff thanks the Joint Powers Authority for the opportunity to present our comments and any questions may be sent to me at pphilley@airquality.org or by calling (916) 874-4882.

Sincerely,



Paul Philley
Assistant Air Quality Planner / Analyst

C: Larry Robinson, Program Coordinator, SMAQMD

Attachments:

- 1) SMAQMD Rules & Regulations Statement

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

*The following statement is recommended as a 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 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 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 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.