

October 7, 2009

SENT VIA E-MAIL

Antonio Ablog
Development Services Department
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

**Subject: Aspen 1 P09-038
SMAQMD # SAC200901352**

Dear Mr. Ablog:

Thank you for providing the Sacramento Metropolitan Air Quality Management District (District) with the opportunity to review this project. Staff comments follow.

Air Quality Mitigation

As you know, the District has adopted CEQA thresholds of significance for use in preparing and reviewing environmental documents. Separate thresholds were established for the construction phase and operational phase of projects. Because of the size of this project, we believe it will generate short term (construction) and perhaps long-term (operations) air quality impacts which may be in excess of the established District thresholds. An air quality analysis should be done on the project in order to determine if project impacts are significant.

If construction impacts are significant, our standard construction mitigation measures should be used. Those measures include both on-site strategies and the possibility of a mitigation fee. More information on construction fees and significance thresholds can be found on our website, www.airquality.org. If operational impacts are significant, we recommend the creation and implementation of an Air Quality Mitigation Plan (AQMP) which would seek to reduce emissions by 15%. We recommend that the AQMP be endorsed by us and included in the DEIR.

Project Design

This project has the potential to generate relatively low operational emissions. It contains a mix of uses; has high potential for multi-modal accessibility due to its street network; and is an adaptive reuse of land that is relatively near to existing urban development. All of these qualities have been proven effective in reducing vehicle miles traveled (VMT) associated with urban development, with the result of low operational emissions.

The details of the project design, however, will be crucial to ensuring that the project utilizes these attributes to reduce VMT. First, the project must have sufficient connectivity to ensure

good conditions for multi-modal accessibility. We recommend block size perimeters of no more than 1,350 feet as a connectivity standard. Some parts of the site plan do not show connectivity to adjacent properties. For example, the long row of houses shown along the northwest portion of the site does not appear to provide for connectivity to possible future developments to the west of the site. We suggest the extension of easements from east-west running streets through that portion of the site, to provide for such connectivity. A similarly long row of houses abuts the shopping center on the northeast corner of the site, with no access shown between the houses and the shopping center. The proximity of the shopping center to the residential area is a mix of uses; but full and easy access must exist between the two uses to fully realize the VMT-reducing potential of mixed use development.

In addition to connectivity, street design must provide good conditions for multi-modal travel. These include full sidewalk provision, with landscaped buffers separating pedestrian ways from busy roadways, and complete bicycle facilities. We also recommend "skinny streets" roadway standards. "Skinny streets" standards accommodate vehicular traffic at no more than 25 miles per hour for local streets, or 35 miles per hour for collector and arterial streets. The slower vehicular speeds and reduced roadway crossing expanse both facilitate the safety and ease of pedestrian and bicycle travel. For reference, the Institute of Transportation Engineers (ITE) has produced a recommended practice document called *Context Sensitive Solutions in Designing Major Urban Thoroughfares for Walkable Communities*¹. This document provides comprehensive parameters for collectors, arterials and thoroughfares that accommodate maximum speeds of 35 miles per hour.

Finally, the proximity of agricultural uses near urban uses – urban farming – is an innovative way to reduce food miles traveled, as well as to provide good community access to fresh healthy food. The District is actively pursuing ways to reduce food miles traveled for communities in Sacramento County, because the transport of food is a major source of vehicular emissions. To be successful, however, urban farming must be properly implemented, e.g., with easements to protect adjacent urban uses. If designed properly, the orchard / green parking lot / farmer's market location concept between the urban farm and the urban uses has potential to be an effective buffer. We greatly anticipate the full design details for this concept.

Climate Change Analysis

We also recommend that the EIR include a discussion of its potential contribution to climate change. Construction activities proposed for this project may result in cumulatively considerable greenhouse gas emissions. While there are currently no adopted thresholds of significance for project-related greenhouse gasses, multiple authoritative resource guides exist for addressing greenhouse gas emissions for projects subject to CEQA. The California Air Pollution Control Officers Association (CAPCOA) publication *CAPCOA CEQA & Climate Change* provides guidance on addressing project impacts on climate change through CEQA (www.capcoa.org). Additionally, the Governor's Office of Planning and Research (OPR) has issued a technical advisory on this subject, entitled *CEQA and Climate Change: Addressing Climate Change*

¹ Institute of Transportation Engineers. *Context Sensitive Solutions in Designing Major Urban Thoroughfares for Walkable Communities*. Washington, D.C. 2006.

Through CEQA Review (www.opr.ca.gov). These documents recommend methods of addressing impacts by (1) quantifying projected greenhouse gas emissions; (2) addressing the significance of the project's impact on climate change; and (3) identifying project alternatives or mitigation measures, if the project is significant. Any environmental document for this project should (1) clearly describe and quantify the greenhouse gas emissions projected to be generated from the project; (2) discuss whether or not the emissions are significant; and (3) include specific alternatives and mitigation measures to reduce those emissions.

Finally, all projects are subject to District rules and regulations in effect at the time of construction. Please see the attached document describing District rules which may apply to this project. We look forward to receiving the environmental document for this project, including the air quality analyses. If you have questions about these comments, please contact me at 916-874-4886 or mwright@airquality.org.

Sincerely,



Molly Wright
Air Quality Planner/Analyst

Cc: Larry Robinson, Program Coordinator, 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.