

December 11, 2008

SENT VIA E-MAIL

Mr. Paul Marx
Director of Planning
Sacramento Regional Transit
P.O. Box 2110
Sacramento, CA 95812

Subject: Notice of Preparation for the Downtown Natomas Airport Light Rail Transit MOS-1 Project Environmental Impact Report

Dear Mr. Marx:

Thank you for referring this Notice of Preparation (NOP) to Sacramento Metropolitan Air Quality Management District (SMAQMD) staff for review and comment. Staff comments are as follows.

Construction-Related Impacts

A project of this size will likely generate construction-related air quality impacts that exceed adopted CEQA thresholds of significance. An air quality analysis should be done on the project to verify the significance of its construction-related air quality impacts. We recommend using the [Roadway Construction Emissions Model](#) (Version 6.3.1, Nov. 2008, in Excel – 4 Mb). If its impacts are found to be significant, we recommend that our standard construction mitigation measures be applied to the project. These measures include both on-site strategies and a possible off-site mitigation fee. They can be found on our website, www.airquality.org.

Operational Impacts

Any negative air quality impacts from this project will likely be construction-related, rather than operational. This project is a public transportation improvement, and will likely reduce vehicle miles travelled, and improve air quality in Sacramento. Project review pursuant to the California Air Quality Act (CEQA) requires analysis of project air quality impacts. The project's potential positive air quality impacts are worth mention in this context.

Greenhouse Gas and Climate Change Impacts

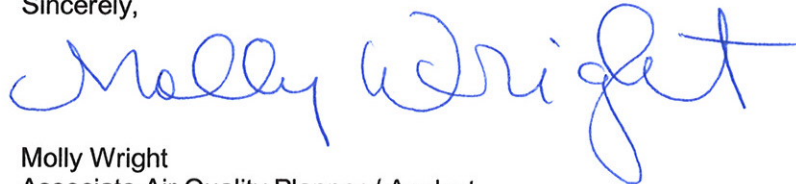
We recommend that the draft EIR include a discussion of climate change. The California Global Warming Solutions Act of 2006 requires the State to reduce its carbon emissions by approximately 25% by the year 2020. This project will likely generate construction-related greenhouse gasses.

Currently there are no adopted thresholds of significance for project-related greenhouse gasses. However, resource guides exist for the analysis and mitigation of greenhouse gas emissions for commercial and other projects. 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 Through CEQA Review* (www.opr.ca.gov). We recommend that the draft EIR follow this guidance.

Finally, all projects are subject to SMAQMD rules and regulations in effect at the time of construction. Please see the attached document describing SMAQMD rules which may apply to this project. Information regarding District rules can be obtained at www.airquality.org or by calling the Compliance Assistance Hotline at 916-874-4883.

If you have any questions on this matter, please contact me at 916-874-4886 or mwright@airquality.org.

Sincerely,



Molly Wright
Associate Air Quality Planner / Analyst

C: Larry Robinson, Program Coordinator, SMAQMD

SMAQMD Rules & Regulations Statement (revised 1/07)

*The following statement is recommended as 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 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.

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.