

March 27, 2009

**SENT VIA E-MAIL**

Mr. Don Smith  
Sacramento Regional Transit District  
P.O. Box 2110  
Sacramento, CA 95812-2110

**Subject: Downtown Natomas Airport Light Rail Transit MOS-1 Project Draft Environmental Impact Report**

Dear Mr. Smith:

Thank you for providing the Draft Environmental Impact Report (EIR) for the Downtown Natomas Airport Light Rail Transit MOS-1 project (DNA MOS-1) to the Sacramento Metropolitan Air Quality Management District (SMAQMD) to review. This project improves transit facilities and will result in a net reduction in air pollutants associated with vehicle travel. SMAQMD comments focus on providing additional construction impacts on air quality, and on assessing the project's impacts on pedestrian and bicycle travel. SMAQMD comments follow.

### **Operational Impacts**

To fully assess the project's operational impacts, it is important to have as much project information as possible. The following information would provide a fuller description of the project:

- Please provide graphics that detail sidewalk improvements and pedestrian crossings, track alignments, bicycle access and other improvement specifications. This kind of graphic was available as an exhibit at the March 11, 2009 open house for the project. Providing this graphic in the environmental document would help full public understanding of the project. Providing cross-sections of the project for the 7<sup>th</sup> Street underpass area would also be helpful.
- Please describe bicycle parking facilities at the proposed light rail stations, especially Richards Boulevard station.
- Please discuss the project's consistency with existing land use plans for the area. For example, the Sacramento Railyards Specific Plan provides cross-sections for portions of 7<sup>th</sup> Street that are on the DNA MOS-1 route; and the Draft EIR does not make clear that all of the project alignments are consistent with this plan. If the alignments are not consistent, please provide an evaluation of the project alignment versus the specific plan cross-sections.

**Construction-Related Impacts**

Because the DNA MOS-1 project is part of the larger Downtown Natomas Airport Light Rail Transit Program EIR, and SMAQMD standard construction mitigation was included in that Program EIR, the mitigation must be applied to the DNA MOS-1 project. The standard construction mitigation is provided on the attached sheet entitled *SMAQMD Recommended Mitigation for Reducing Emissions from Heavy-Duty Construction Vehicles*.

Mitigation measures AQ1 – AQ3 appear to be modeling assumptions from the *Roadway Construction Emissions Model* prepared for the project. Generally, the SMAQMD does not recommend using modeling assumptions as mitigation measures. They can be difficult to monitor and enforce. If the purpose of AQ1-AQ3 is to ensure construction emissions do not exceed the SMAQMD threshold of 85 pounds of NOx per day, the inclusion of the SMAQMD's standard construction mitigation should provide RT some reassurance.

Finally, the ISCST3 air dispersion model was used to determine localized construction impacts from PM10 emissions for the project, according to page 5.1-14. As with all modeling runs used to analyze the project, the outputs from the ISCST3 run should be included in an appendix to be reviewed and evaluated.

If you have any questions regarding these comments, please contact Molly Wright at 916-874-4886 or [mwright@airquality.org](mailto:mwright@airquality.org). This project is also subject to any and all SMAQMD rules in effect at the time of construction. The attached sheet entitled *SMAQMD Rules & Regulations Statement* enumerates some of those rules for your convenience. Additional information about those and all other rules that may be applicable can be found at [www.airquality.org](http://www.airquality.org) or by calling Compliance Assistance at (916) 874-4884

Sincerely,



Molly Wright  
Air Quality Planner/Analyst

Cc: Larry Robinson, Program Coordinator, SMAQMD

# **SMAQMD Recommended Mitigation for Reducing Emissions from Heavy-Duty Construction Vehicles**

*Apply only to projects with construction emissions above the CEQA Threshold of Significance.*

Revised December 1, 2008

## *Category 1: Reducing NOx emissions from off-road diesel powered equipment*

The project shall provide a plan, for approval by the lead agency and SMAQMD, demonstrating that the heavy-duty (> 50 horsepower) self-propelled off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NOx reduction and 45 percent particulate reduction<sup>1</sup> compared to the most recent CARB fleet average at time of construction; and

The project representative shall submit to the lead agency and SMAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the construction project. The inventory shall include the horsepower rating, engine production year, and projected hours of use for each piece of equipment. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs. At least 48 hours prior to the use of subject heavy-duty off-road equipment, the project representative shall provide SMAQMD with the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman.

**and:**

## *Category 2: Controlling visible emissions from off-road diesel powered equipment*

The project shall ensure that emissions from all off-road diesel powered equipment used on the project site do not exceed 40 percent opacity for more than three minutes in any one hour. Any equipment found to exceed 40 percent opacity (or Ringelmann 2.0) shall be repaired immediately, and the lead agency and SMAQMD shall be notified within 48 hours of identification of non-compliant equipment. A visual survey of all in-operation equipment shall be made at least weekly, and a monthly summary of the visual survey results shall be submitted throughout the duration of the project, except that the monthly summary shall not be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles surveyed as well as the dates of each survey. The SMAQMD and/or other

officials may conduct periodic site inspections to determine compliance. Nothing in this section shall supercede other SMAQMD or state rules or regulations.

**and/or:**

If at the time of construction, the SMAQMD has adopted a regulation applicable to construction emissions, compliance with the regulation may completely or partially replace this mitigation. Consultation with SMAQMD prior to construction will be necessary to make this determination.

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<sup>1</sup>Acceptable options for reducing emissions may include use of newer model year engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.

## **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](http://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.