

September 26, 2008

SENT VIA EMAIL

Mr. Taro Echiburu  
Environmental Coordinator  
City of Elk Grove  
8401 Laguna Palms Way  
Elk Grove, CA 95758

**RE: Sheldon/99 General Plan Amendment and Rezone Draft Environmental Impact Report (SAC200701208A)**

Dear Mr. Echiburu:

Thank you for providing the Sheldon/99 General Plan Amendment and Rezone Draft Environmental Impact Report (DEIR) to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review. Staff comments follow.

Short-term exposure to toxic air contaminants is discussed in the DEIR (page 4.7-26), but there is no mention of long-term exposure to toxic air contaminants. The proposed residential land uses appear to be within 500 feet of State Route 99, therefore the DEIR should discuss the potential impact of freeway emissions and consider a 500 feet buffer between State Route 99 and the residential land uses, or at a minimum require the use of the SMAQMD's *Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways* to evaluate and disclose increased cancer risk to future residences.

Even though the DEIR did not address bicycle and pedestrian connectivity in detail, the SMAQMD agrees connectivity could be addressed through implementation of General Plan Policies CI-4 through CI-7 (page 4.5-14) and the development and implementation of an operational air quality mitigation plan (AQMP) (page 4.7-27) during the development application process.

Since the air quality analysis suggests NOx emissions from construction activities will not exceed the SMAQMD's threshold of 85 pounds/day (table 4.7-5), the SMAQMD recommends mitigation measures 4.7.1f and 4.7.1g be removed. The SMAQMD has discovered that contractors working on projects that don't exceed the SMAQMD's NOx threshold may have difficulty meeting mitigation measures similar to 4.7.1f and 4.7.1g.

Generally, the SMAQMD prefers to see the AQMP in the environmental document. Since that is not practical for this program level DEIR, the SMAQMD recommends the AQMP be developed and endorsed at the time of the development application rather than prior to the issue of grading permits as noted in the DEIR (page 4.7-27).

Mr. Echiburu  
Sheldon/99 GPA and Rezone  
September 25, 2008  
Page 2

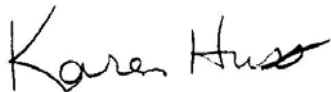
In addition to listing available mitigation measures to be included in the AQMP for this project (page 4.7-27), the SMAQMD recommends the DEIR reference the SMAQMD's *Guide for Land Use Emissions Reductions* for a comprehensive list of available mitigation measures and guidance in developing the AQMP. Additionally, SMAQMD staff is available to assist the proponents and City staff in development of the AQMP.

The SMAQMD appreciates the detailed treatment of climate change in the DEIR. Rather than indicate no mitigation measures are available for impact 4.7.5 (page 4.7-34), Elk Grove should note that the development of an AQMP will assist in reducing CO<sub>2</sub> emissions from the project. Additionally, the California Attorney General's Office has developed a list of mitigation measures that should be reviewed and, if any deemed feasible, be included as part of this project.

In the first paragraph on page 4.7-35 there are references to MM 4.7.2 and MM 4.4-5. These references cannot be found in the DEIR. Please clarify.

If you have any questions regarding these comments please contact Charlene McGhee at 916-874-4883 or [cmghee@airquality.org](mailto:cmghee@airquality.org) or me at (916) 874-4881 or [khuss@airquality.org](mailto:khuss@airquality.org).

Sincerely,

A handwritten signature in black ink that reads "Karen Huss". The signature is written in a cursive, slightly slanted style.

Karen Huss  
Associate Air Quality Planner/Analyst

Cc: Larry Robinson, Sacramento Metropolitan AQMD