

May 6, 2010

SENT VIA E-MAIL ONLY

Mr. Ron Scott
SMUD
P.O. Box 15830 M.S. B203
Sacramento, CA 95852-1830

**SMUD East Campus – Operations Center Project Draft Environmental Impact Report
(SAC200901349)**

Dear Mr. Scott:

Thank you for providing the SMUD East Campus-Operations Center Project Draft Environmental Impact Report (DEIR) to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review. This project involves the relocation of SMUD's corporation yard from 59th Street in the City of Sacramento to a 51-acre site at the southeast corner of Kiefer Boulevard and Bradshaw Road in unincorporated Sacramento County. Corporation yard activities include offices, mechanical shops, maintenance and warehouse operations, fueling station and vehicle washing. Staff comments regarding the air quality and climate change analyses presented in the DEIR follow.

Air Quality

1. Although stationary sources requiring SMAQMD permits to operate are discussed on pages 155, 161 and 162, estimates of criteria pollutant and toxic emissions from those sources are not included in the DEIR. To fully disclose air quality impacts of the project, emission estimates need to be included.
2. Because the project is in close proximity to Rosemont High School and other receptors, SMAQMD permitting staff recommends a project health risk assessment be conducted to disclose toxic emissions exposure.
3. SMUD needs to work with SMAQMD permitting staff to identify if the School Public Noticing requirement in Health and Safety Code §42301.6 applies to the project.
4. SMAQMD commends SMUD for showing caution by including mitigation to ensure construction emissions remain below the SMAQMD's significance threshold. (Pg. 160, Mitigation AIR-1a)
5. Since operational emissions of nitrogen oxides exceed the SMAQMD's significance threshold, SMAQMD recommends an Air Quality Mitigation Plan (AQMP) be prepared. The AQMP should describe mitigation measures committed to by SMUD that will reduce operational emissions by at least 15%, show calculations when necessary, and outline how the mitigation measures will be implemented. SMAQMD provides guidance on preparing an AQMP, which can be accessed at the following link: www.airquality.org/ceqa/GuidanceLUEmissionReductions.pdf. The AQMP should be a separate document from the updated Transportation Management Plan referenced as mitigation in the DEIR. (Pg. 163, Mitigation AIR-2)

Climate Change

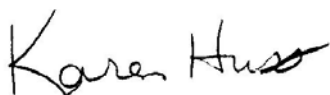
6. Greenhouse gas emissions (GHG) from construction activities were estimated and compared to the County of Sacramento's Commercial and Industrial Sector Development Threshold. The County's threshold does not apply to construction emissions. The SMAQMD recommends SMUD include all feasible best management practices noted in Chapter 6 of the SMAQMD's CEQA Guide, which can be accessed at the following link:
www.airquality.org/ceqa/cequguideupdate/Ch6FinalConstructionGHGReductions.pdf.
7. It does not appear that operational GHG emissions in Table 11-5 include fossil fuel combustion from stationary sources (emergency generators and fire pumps). The SMAQMD requests GHG emissions are added. (Pg. 186)
8. Operational emissions of GHG exceed the County of Sacramento's Development Threshold for Transportation. Similar to comment 5 above, the SMAQMD recommends an AQMP be prepared that includes GHG mitigation measures. In this document, SMUD should describe in more detail commitments to LEED and net-zero energy measures and corresponding GHG reductions along with the transportation mitigation measures described on pages 186 and 187.

General

9. The SMAQMD prefers the AQMP be prepared, reviewed and endorsed prior to finalizing the EIR. Also, the AQMP and its mitigation measures should be included in the Mitigation Monitoring Plan or as Conditions of Approval for the project to ensure they will be part of the project.
10. SMUD reports 36% of its employees use alternative transportation modes (pages 131 and 163). The proposed Kiefer/Bradshaw location appears less transit friendly than the current location at 59th Street. The SMAQMD encourages SMUD to meet or exceed the 36% mode split to support emission reductions. SMUD should explore the feasibility of expanding transit options either through Sacramento Regional Transit (route 72) or e-Tran (routes 70 and 71), improve bike and pedestrian infrastructure and provide financial incentives for employees to use alternative modes.
11. All projects are subject to SMAQMD rules in effect at the time of construction. For a complete listing of rules visit www.airquality.org or contact the compliance assistance hotline at 916-874-4884.

Your consideration of these comments is appreciated. Permitting comments (comments 1-3 and 7) are especially important so the SMAQMD can utilize this environmental document for permitting SMUD's equipment. If you have any general questions, please contact me at 916-874-4881 or khuss@airquality.org. Stationary source/permitting questions should be directed to Ali Othman at 916-874-4857 or aothman@airquality.org.

Sincerely,



Karen Huss
Associate Air Quality Planner/Analyst

Cc: Mr. Larry Robinson, SMAQMD
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