

April 3, 2007

Ms. Diane Nakano, P.E.
Assistant General Manager for
Engineering & Construction
Sacramento Regional Transit District
P.O. Box 2110
Sacramento, CA 95812

**RE: Supplemental Draft EIR/EIS for South Sacramento Corridor Phase 2 Project
SMAQMD No. : SAC200701097**

Dear Ms. Nakano:

Thank you for the opportunity to review and comment on the above referenced project. The consideration of the other large projects to take place over the course of the construction of South Sacramento Corridor Phase 2 and the inclusion of our Standard Construction Mitigation is commendable. Ongoing coordination with the other projects in the area can only be a benefit to all concerned. Additional Sacramento Metropolitan Air Quality Management District staff comments are as follows:

1. Regional Transit may wish to consider whether the environmental document needs to contain a discussion of climate change. The emerging issue of climate change has gained a great deal of attention in the past several years. As you know, on September 27, 2006, the State of California passed into law AB32, the Global Warming Solutions Act of 2006 which requires the State to reduce its carbon emissions by approximately 25% by the year 2020. In addition, California Attorney General Bill Lockyer raised the issue of global warming in his comment letter (3/20/06) on the Orange County Transportation Authority's 2006 Long-Range Transportation Plan Draft Program EIR. His precedent-setting letter pointed out that one of the most important environmental impacts of vehicle emissions is greenhouse gases (GHG) and the resulting climate change. In addition to transportation sources, greenhouse gases are also generated by industry and agricultural activities.

The major anthropogenic greenhouse gases are; carbon dioxide, methane, and nitrous oxide. Neither the District, state, nor federal government have specific thresholds of significance for project-related greenhouse gases. That makes discussions on a project's cumulative impact to global warming problematic. Over time, we expect the scientific community to develop more tools help analyze and effectively mitigate greenhouse gases. In the meantime, the next version of URBEMIS, to be released shortly, will include CO² emissions estimates for land use projects, and the District's revised Guidance for Land Use Emissions Reductions includes information on mitigation options for development projects. District staff would be happy to provide information on other resources as they become available.

2. Construction emissions were calculated using EMFAC2001 which may not reflect the most current information available. The EMFAC model has been updated twice since the 2001 version, most recently in late 2006 (EMFAC 2007). At a minimum the use of the Sacramento Metropolitan Air Quality Management District's Roadway Construction Emissions Model (v.5.2), recommended for linear projects such as this one, may produce emission results that are more reflective of the Sacramento area.
3. Regarding emissions associated with the parking structure; encouraging other local transit providers, specifically ETran and Paratransit, to include the Cosumnes River College Station and other stations as appropriate in their routes, will further reduce light duty trips.

4. This project is also subject to any and all District rules in effect at the time of construction. The attached sheet 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 or by calling Compliance Assistance at (916) 874-4884.

Sincerely,

Charlene McGhee
Associate Air Quality Analyst

Attachment

c: Larry Robinson, Land Use and Transportation Program Coordinator, Sacramento Metropolitan AQMD