

September 21, 2007

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

RE: Sutter Elk Grove Master Plan Notice of Preparation

Dear Mr. Echiburu:

Thank you for providing the above referenced project to the Sacramento Metropolitan Air Quality Management District (District) for review and comment. Staff comments are as follows:

1. When the air quality analysis is completed and if it indicates that the project exceeds the construction air quality thresholds of 85 pounds per day of NOx then standard construction mitigation will be applied. If it is determined that the standard construction mitigation does not lower the emissions to below the threshold, than an offsite fee for the remaining emissions above the threshold should be assessed. In addition, as of February 15, 2007, a 5% administrative fee should be assessed as well.
2. If analysis indicates this project will exceed the operational threshold of 65 pounds per day of ROG then, per Elk Grove General Plan Policy CAQ-30, we recommend that City staff and the proponent work closely with District staff to develop an Air Quality Mitigation Plan (AQMP) to help ensure completion of a Plan prior to the release of the Draft EIR. The AQMP is intended to reduce the operational emissions of a project by 15%.
3. The City may wish to include in the Draft EIR a comprehensive discussion on climate change and green house gases as it applies to this project. As you know, on September 27, 2006, the State of California passed into law AB32, the Global Warming Solutions Act of 2006. This Act requires the State to reduce its carbon emissions by approximately 25% by the year 2020. In addition, the State Attorney General's office has been closely scrutinizing local environmental documents and weighing in on their adequacy as it pertains to global warming. With that in mind, the District has recently made available a guidance document (attached) intended to assist local jurisdictions as they attempt to address climate change and green house gas related strategies.

In addition this project is subject to all applicable District rules and regulations (see attachment) in effect at the time of construction. Information regarding all District rules can be obtained at www.airquality.org or by calling the Compliance Assistance Hotline at (916) 874-4884.

If there are any questions regarding these comments please contact me at (916) 874-4883 or cmcghee@airquality.org.

Sincerely,

Charlene McGhee
Associate Air Quality Planner/Analyst

Attachments

- c: Dan Canwell; Facility Planning and Development, Sutter Health
- Larry Robinson; Land Use and Transportation, Sacramento Metropolitan AQMD