

Sent Via Email Only

November 9, 2011

Division of Environmental Affairs
Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825

SUBJECT: Joint Operations Center Relocation Project

SMAQMD #: SAC201101407

Dear Mr. Kleinsmith,

Thank you for notifying the Sacramento Metropolitan Air Quality Management District (SMAQMD) of the availability of the DEIR/DEIS for the Joint Operations Center Relocation Project. SMAQMD staff has reviewed the document and its relevant technical analyses and provides the following comments.

Significance Determination for Impact 3.4-1: Generation of Construction-Related and Operational Greenhouse Gas Emissions That Have a Cumulative Effect on the Environment (Proposed Action, Alternative 1 and Alternative 2)

Page 3.4-20 correctly states that “neither ARB nor SMAQMD has adopted quantitative thresholds of significance for GHG emissions”; however, the Greenhouse Gas chapter omits the fact that the County of Sacramento (in which the Proposed Action and Alternative 1 would be located) does have quantitative greenhouse gas thresholds (Residential: 1.33 MT per capita; Commercial/Industrial: 7.87 MT per kft², Transportation: 2.64 MT per capita). Instead of using these thresholds as the basis of a significance finding, the discussion compares the net emissions (an issue discussed below) from the Proposed Action and Alternative 1 to the existing conditions in making a less than significant determination. *SMAQMD staff strongly encourages Reclamation or DWR to utilize one or more of the thresholds such as those proposed by the County of Sacramento in determining significance for the Proposed Action and Alternative 1.*

As mentioned above, the analysis relies on the concept of netting greenhouse gas emissions. The Proposed Project and Alternative 1, for example have emissions of 4,750 MTCO₂e/yr. Instead of analyzing this impact, the document nets those emissions against the currently operating facilities. However, netting is only appropriate where the original land use is completely destroyed such that it no longer would create operational emissions. The Greenhouse Gas chapter does not clearly explain why netting is appropriate in this instance, nor do the air quality analyses include emissions associated with demolition, leading us to believe the existing facilities will remain. *SMAQMD recommends that the DEIR discuss why netting is appropriate, and, if needed, revise any related emissions analyses. The total emissions impact of each alternative needs to be analyzed separately and not netted against existing conditions.*

The analysis and significance finding for Alternative 2 of Impact 3.4-1 is problematic for several reasons. First, it relies in part on emissions reductions associated with the 15% Mather Field Specific Plan Operational Air Quality Mitigation Plan (AQMP), adopted in 2004, and assumes that a 15% reduction in ozone precursors would also result in a 15% reduction in greenhouse gases. Additional discussion and analysis is warranted in this regard. More importantly,

SMAQMD has expressed ongoing concerns regarding the failure of the Mather Field Specific Plan to comply with its air quality mitigation measures. *SMAQMD staff strongly discourages the DEIR from applying any emissions reductions from the Mather Field Specific Plan AQMP to Alternative 2. Instead, project specific GHG mitigation should be formulated for this alternative and any alternative found to be significant.*

Significance Determination for Impact 3.4-2: Conflict with an Applicable Plan, Policy or Regulation Adopted to Reduce Greenhouse Gas Emissions (Proposed Action, Alternative 1)

As with Impact 3.4-1, the discussion for 3.4-2 fails to mention the greenhouse gas thresholds adopted by the County in making the determination of Less than Significant for direct impacts. In addition, the determination prematurely relies on the draft Climate Action Plan (CAP) being developed by County staff. Part II of the County's Climate Action Plan has not been developed and neither part has been adopted by the County. It is not appropriate to rely on mitigation that is yet to be adopted. *SMAQMD staff strongly discourages the DEIR from taking yet-to-be approved County CAP into account when making its significance determination.*

Please note that a preliminary analysis conducted by SMAQMD staff indicates that the Proposed Action and Alternative 1 exceed the County's energy and transportation greenhouse gas emissions.

The District also takes issue with the modeling for the project and alternatives. The greenhouse gas emissions analysis and resulting findings of significance rely in part on use of the BGM (Bay Area Gas Model) run, which was run for the year 2020. By 2020, many state mandated measures will be in effect, including reductions from the Pavley bill, Low Carbon Fuel standard and other transportation-related measures. The use of the 2020 model year essentially lets the state do the work of mitigating the project's emissions. However, we note that the DEIR states that 2014 is the year of build out, not 2020. If the project is determined to be significant after it is accurately modeled using the appropriate build out year, then specific project-related GHG mitigation should be required. *SMAQMD staff strongly recommends modeling this project using emissions from the year 2014, and using the resulting data in determining significance.*

Impact 3.2-2: Generation of Long Term Operational (Regional) Emissions of ROG and NOx That Exceed SMAQMD Thresholds

The analysis and discussion are confusing and warrant further explanation, especially regarding the use of the traffic study outputs in the URBEMIS emissions model. The URBEMIS output indicates that the "government office building" land use was selected. The default trip rate for this land use is 68.93. However, the model output shows a trip rate of 11.5, indicating a user override (11.5 is the "office park" trip rate), yet, we cannot find the model-generated disclosure that an override occurred. *SMAQMD strongly recommends that the EIR include a thorough discussion of the traffic study and how it relates to the URBEMIS run and operational outputs including a thorough description of the trip rates chosen, and include any model-generated disclosure statements.*

Stationary Sources

Page 3.2- 37 indicates that diesel generators will operate during an outage and states that because they would be permitted by SMAQMD, the toxic air contaminant impact would be less than significant. This is not necessarily true. *The EIR should include a more robust discussion of stationary source toxic air contaminants. A health risk assessment is advised to be included in the FEIR/FEIS.*

Again, thank you for notifying SMAQMD of this project and please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "RDuBose". The letters are cursive and fluid, with the first letters of "R", "D", and "B" being capitalized and prominent.

Rachel DuBose
Air Quality Analyst
Sacramento Metropolitan Air Quality Management District

C: Larry Robinson, Sacramento Metropolitan Air Quality Management District
Jeane Berry, Sacramento Metropolitan Air Quality Management District (Climate Change)
Jorge DeGuzman, Sacramento Metropolitan Air Quality Management District (Stationary Sources)
Catherine Hack, County of Sacramento