

January 5, 2009

SENT VIA E-MAIL

Ms. Laura Caballero  
Bureau of Reclamation  
Central California Area Office  
7794 Folsom Dam Road  
Folsom, CA 95630

**Subject: Folsom Reservoir Safety of Dams – Mormon Island Auxiliary Dam**

Dear Ms. Caballero:

Thank you for providing this project to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for staff review. Staff comments follow.

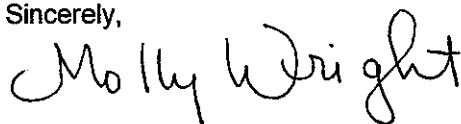
We believe there may be significant air quality impacts from the construction activities proposed for this project. SMAQMD has established a construction phase threshold of significance for NO<sub>x</sub> of 85 pounds per day. An air quality analysis should be done on the project to verify the significance of its construction-related air quality impacts. We recommend using the most current version of URBEMIS 2007, version 9.2.4, available at [www.urbemis.com](http://www.urbemis.com). If its impacts are found to be significant, we recommend that our standard construction mitigation measures be applied to the project. These measures include both on-site strategies and a possible off-site mitigation fee. They can be found on our website, [www.airquality.org](http://www.airquality.org).

We also recommend that the EIR include a discussion of climate change. Construction activities proposed for this project may result in significant greenhouse gas emissions. While there are currently no adopted thresholds of significance for project-related greenhouse gasses, multiple authoritative resource guides exist for addressing greenhouse gas emissions for projects subject to CEQA. The California Air Pollution Control Officers Association (CAPCOA) publication *CAPCOA CEQA & Climate Change* provides guidance on addressing project impacts on climate change through CEQA ([www.capcoa.org](http://www.capcoa.org)). Additionally, the Governor's Office of Planning and Research (OPR) has issued a technical advisory on this subject, entitled *CEQA and Climate Change: Addressing Climate Change through CEQA Review* ([www.opr.ca.gov](http://www.opr.ca.gov)).

Finally, all projects are subject to SMAQMD rules and regulations in effect at the time of construction. Please see the attached document describing SMAQMD rules which may apply to this project. Information regarding District rules can be obtained at [www.airquality.org](http://www.airquality.org) or by calling the Compliance Assistance Hotline at 916-874-4883.

If you have any questions on this matter, please contact JJ Hurley at 916-874-2694 or [jjhurley@airquality.org](mailto:jjhurley@airquality.org), or Molly Wright at 916-874-4886 or [mwright@airquality.org](mailto:mwright@airquality.org). We look forward to receiving a copy of the Draft EIR for this project for review.

Sincerely,



Molly Wright  
Associate Air Quality Planner / Analyst

c: Larry Robinson, Program Coordinator, SMAQMD

## **SMAQMD Rules & Regulations Statement** (revised 1/07)

*The following statement is recommended as standard condition of approval or construction document language for **all** development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):*

All projects are subject to SMAQMD rules and regulations in effect at the time of construction. A complete listing of current rules is available at [www.airquality.org](http://www.airquality.org) or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

**Rule 201: General Permit Requirements.** Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the District early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc) with an internal combustion engine over 50 horsepower are required to have a SMAQMD permit or a California Air Resources Board portable equipment registration.

Other general types of uses that require a permit include dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

**Rule 403: Fugitive Dust.** The developer or contractor is required to control dust emissions from earth moving activities or any other construction activity to prevent airborne dust from leaving the project site.

**Rule 417: Wood Burning Appliances.** Effective October 26, 2007, this rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

**Rule 442: Architectural Coatings.** The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

**Rule 902: Asbestos.** The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.